

# LIFELINE NATIONAL VERIFIER PLAN

JANUARY 2017



Universal Service  
Administrative Co.

# Overview of the National Verifier Plan

**This document is the National Verifier Plan (the "NV Plan") and was created in response to the Lifeline Reform and Modernization Order (the "Modernization Order") adopted by the Federal Communications Commission (FCC) in March 2016.<sup>1</sup>**

- The National Verifier Plan contains a section detailing each of ten key components, as well as an introduction (at the beginning) and a [glossary of key terms](#) (at the end).
  - The NV Plan also contains a section responding to public comments received on the Draft NV Plan (see following slide).
- The National Verifier Plan has been approved by the Wireline Competition Bureau and the Office of the Managing Director at the FCC.

**The Modernization Order requires that the USAC provide updates on progress every 6 months during the implementation of the National Verifier. Further, USAC will continue to provide updates on the NV implementation at [www.lifelinenationalverifier.org](http://www.lifelinenationalverifier.org).**

- Interested members of the public are always welcome to provide comments on the NV Plan to USAC by visiting the NV website at [www.lifelinenationalverifier.org](http://www.lifelinenationalverifier.org).
- Comments can also be submitted via email at [LifelineProgram@usac.org](mailto:LifelineProgram@usac.org); however, USAC recommends that stakeholders use the functionality on the NV website.

1. The Modernization Order can be found on the FCC's website: [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf)

## The NV Plan includes responses to public comments received by USAC on the Draft NV Plan

Because stakeholder feedback is critical to the success of the National Verifier – both in the development and rollout phases – the Universal Service Administrative Company (USAC) invited the public to comment on the Draft National Verifier Plan.

- Comments received through December 5, 2016 to December 30, 2016 were considered in this version of the National Verifier Plan.

We have responded to many of the public comments received in a new section at the end of the document called "Responses to public comments".









- This section begins at slide 97.
- Comments and responses are organized by theme / issue.

In some cases, we have responded to public comments by editing a slide (e.g., clarifying language on a slide).

- These slides have flags on the top right that read "UPDATED".
- Any new or modified text is colored orange (as here).

The NV Plan reflects all comments received during the public comment period

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# Background: The FCC has charged USAC to develop and implement the National Verifier to determine Lifeline eligibility

In March 2016, the Federal Communications Commission (FCC) adopted the Lifeline Reform and Modernization Order (Modernization Order), further updating the Lifeline program to, among other things, streamline eligibility verification for enrollment and recertification.

Currently, applicants' eligibility can be verified through one of several methods by a Service Provider or a state administrator. The FCC has recognized that this system can be complex, burdensome, and leaves open the potential for waste, fraud, and abuse.

As a result, the Modernization Order mandated the creation of a National Verifier (NV) to standardize eligibility verification across all states and territories and to perform the following functions:

- Create the Lifeline Eligibility Database (LED), which will be connected to state and federal data sources,<sup>1</sup> to determine eligibility for both initial enrollment and annual recertification;
- Allow Service Providers, consumers, and state, territory, or tribal government users to check eligibility or enrollment status; and
- Calculate payments to Service Providers based on data available through National Verifier.

The Modernization Order tasked USAC, in consultation with the FCC, with developing and implementing the National Verifier in phases from the end of 2017 through the end of 2019.

Please note that this plan will be a living document. It will be updated every six months and progress reports will be submitted to the FCC as required by the Modernization Order.

1. Data sources of qualifying eligibility programs (e.g., Medicaid)

# In the 2016 Modernization Order, the FCC identified three main goals for the National Verifier

1

## Stronger Program Integrity



- Independent eligibility verification, with more automatic checks, conducted directly by USAC to reduce waste, fraud, and abuse
- Single eligibility system to audit and report on potential fraud metrics
- Streamlined, consistent processes to distinguish mistakes from waste, fraud, and abuse

2

## Reduced Complexity



- Streamlined access to eligibility information for Service Providers
- States relieved of maintaining data use agreements and interfaces with multiple SPs
- More automatic checks of data sources to determine eligibility
- Central source of program information and support for consumers

3

## Lower Cost



- SPs relieved of eligibility verification burden
- Lower cost to aggregated system due to more streamlined processes:
  - More automated verification to reduce costly manual reviews; and
  - More automated recertification to reduce costly outreach



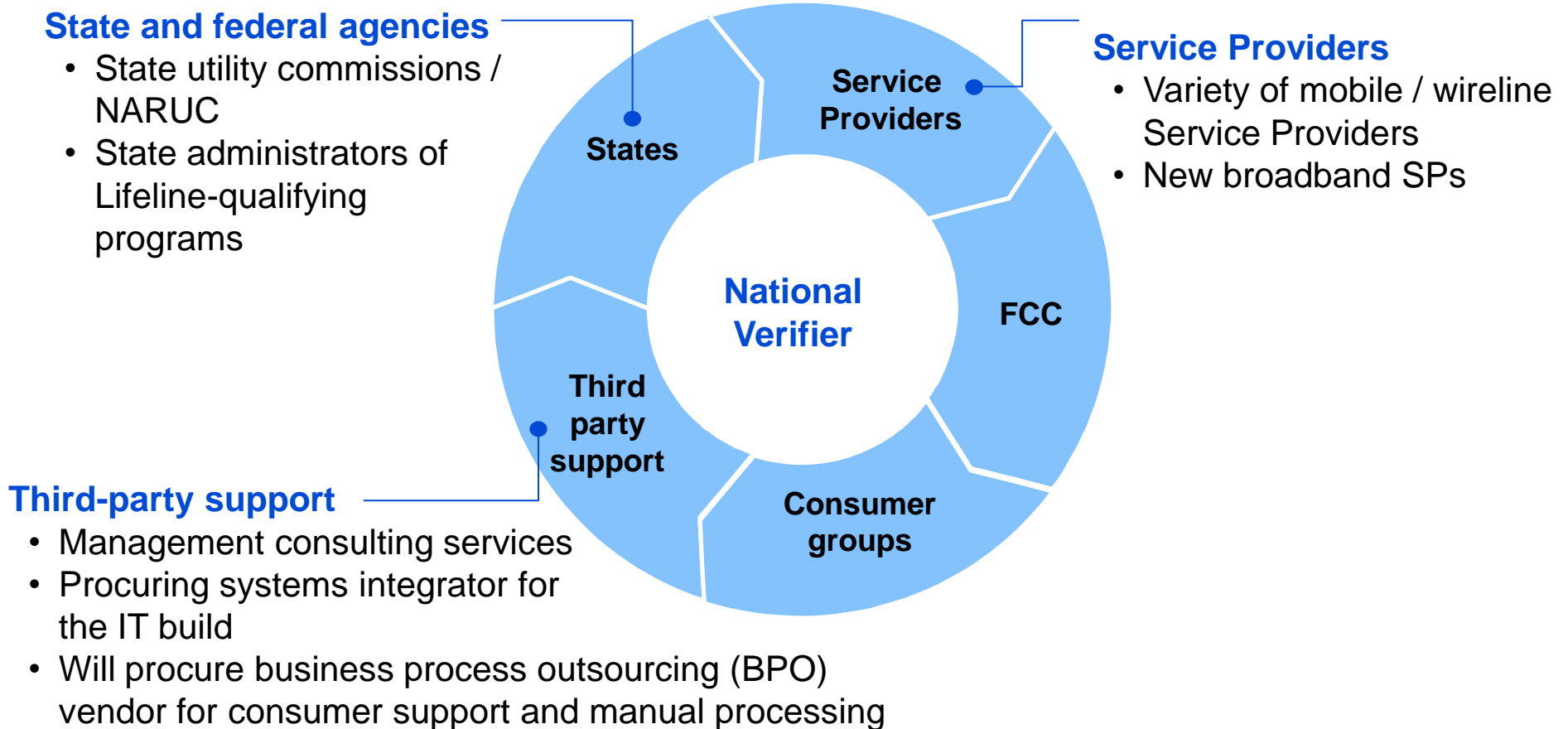
# USAC has followed a methodical process to develop the National Verifier Plan...

- 1 Work closely with the FCC to better understand the Lifeline Modernization Order
- 2 Seek best-in-class support from external vendors to design the National Verifier and help navigate the changes required at USAC
- 3 Conduct interviews, research benchmarks, and consult with states on best practices for verification systems and processes
- 4 Design the National Verifier based on findings
- 5 Review proposed design of the National Verifier with stakeholders (*details on next slide*)
- 6 Develop the Draft National Verifier Plan and submit it to the FCC before December 1, 2016
- 7 Publish Draft National Verifier Plan
- 8 Seek comments on the Draft National Verifier Plan and incorporate feedback into the National Verifier Plan ([this document](#))












## ...and we have incorporated input from multiple stakeholder groups throughout the Draft NV Plan



**Stakeholder input will be critical beyond this point: we will need input throughout the multi-year implementation and rollout of the NV**

# There are a variety of different criteria by which applicants can demonstrate eligibility for Lifeline

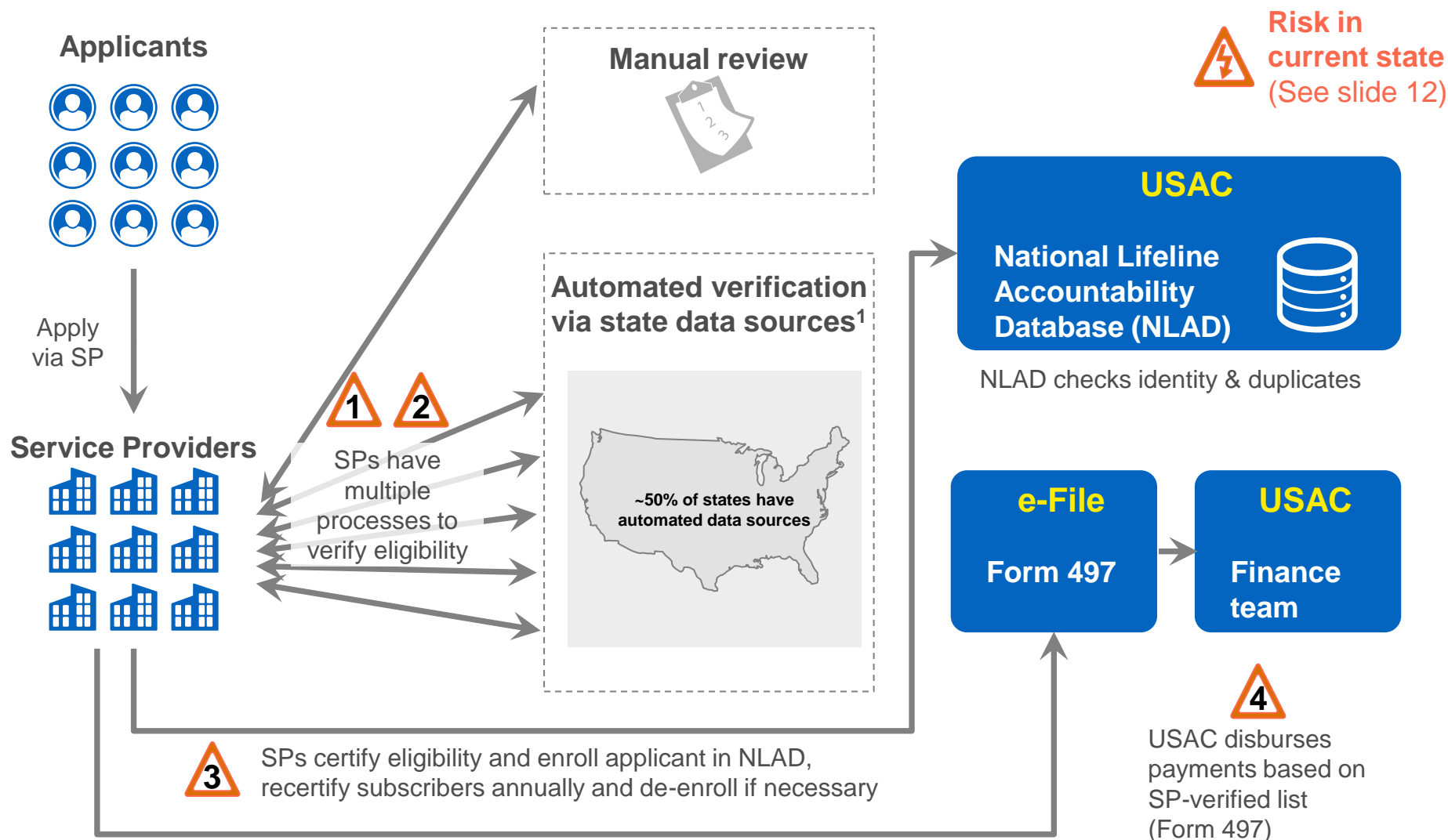
		Current % of LL applicants qualifying through criterion <sup>1</sup>	Comments
Medicaid		38%	<ul style="list-style-type: none"> <li>Qualify through enrollment in Medicaid</li> </ul>
SNAP		38%	<ul style="list-style-type: none"> <li>Qualify through enrollment in SNAP</li> </ul>
SSI		3%	<ul style="list-style-type: none"> <li>Qualify by receiving SSI payments</li> </ul>
Federal Public Housing Assistance		0.6%	<ul style="list-style-type: none"> <li>Qualify by receiving public federal housing benefits</li> </ul>
Income		3%	<ul style="list-style-type: none"> <li>Qualify if income is at or below 135% of the federal poverty line</li> </ul>
Tribal <sup>2</sup>		0.2%	<ul style="list-style-type: none"> <li>Qualify by receiving certain tribally-focused assistance programs<sup>3</sup></li> </ul>
VA		N/A (eligible as of December 2 <sup>nd</sup> , 2016)	<ul style="list-style-type: none"> <li>Qualify by receiving the Veterans Pension / Survivor Benefits</li> </ul>

1. Numbers do not add to 100% due to rounding and the Modernization Order's removal of certain qualifying criteria for Lifeline eligibility determination

2. Must live on tribal land to qualify through tribal programs

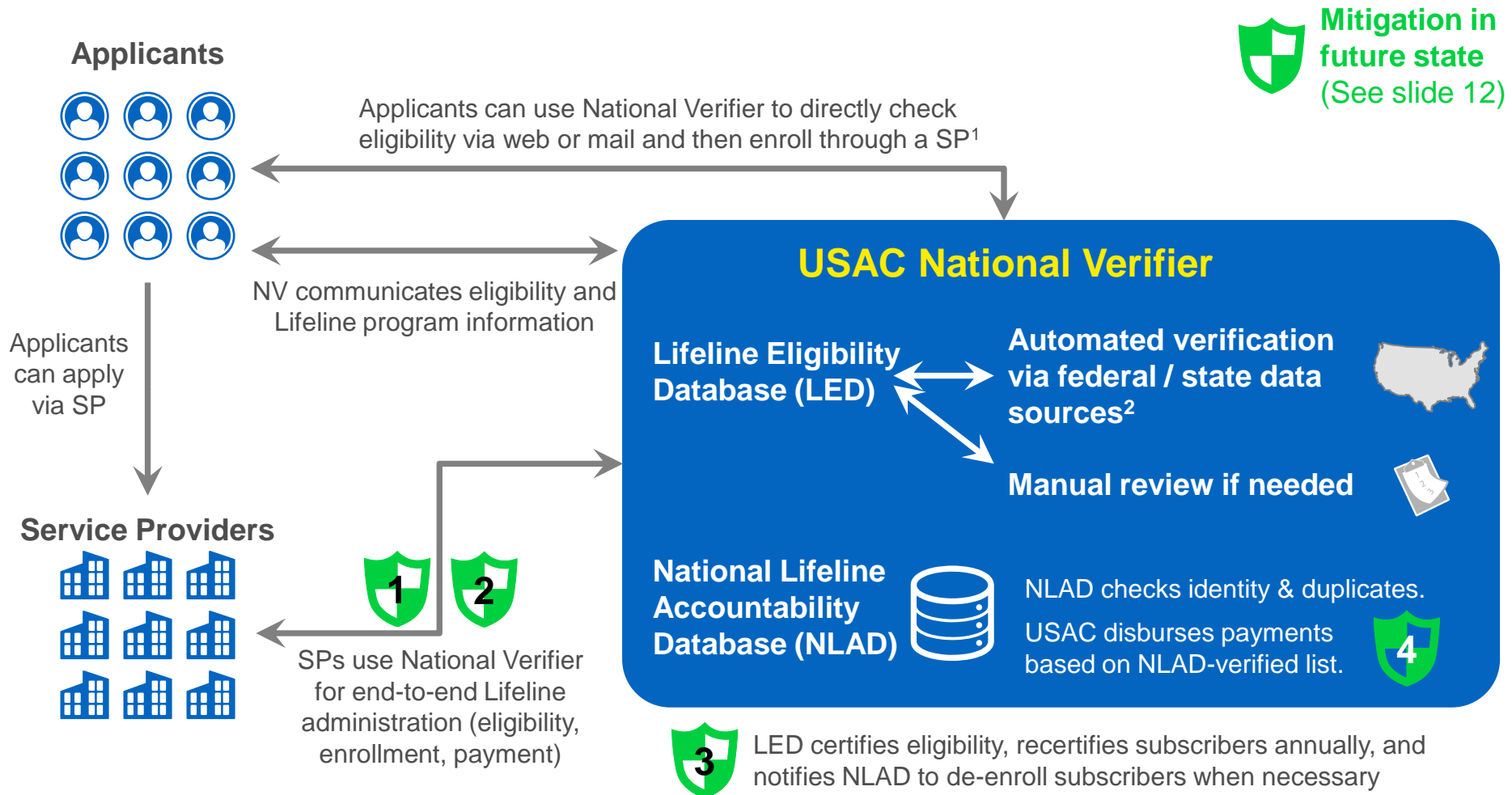
3. Bureau of Indian Affairs General Assistance, Tribally-administered Temporary Assistance for Needy Families, income-based Head Start, or the Food Distribution Program on Indian Reservations

# Lifeline will move from the current state where Service Providers conduct eligibility verification...



1. For example: Medicaid, SNAP, SSI

# ...to a future state where USAC conducts eligibility verification through the National Verifier...



1. If eligible, applicant receives application number and list of nearby SPs 2. For example, Medicaid, SNAP, SSI

# ...which is designed to address several program integrity risks in the current Lifeline program

## Current program integrity risk



**Service Providers conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse**



**Variation in eligibility verification processes across Service Providers and states creates potential for confusion, errors, inconsistency**



**Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD**



**Payment complexity due to separate processes for enrollment and claims for reimbursement**

## Planned NV mitigation strategy



**Centralize eligibility verification with USAC, a neutral party**



**Standardize eligibility verification processes through the National Verifier**

- More automated verification by pinging federal data sources increases accuracy
- Centralized manual reviews conducted by BPO vendor that adheres to consistent quality control standards



**Automate recertification to re-confirm eligibility (removing need for self-certification for majority of subscribers)**

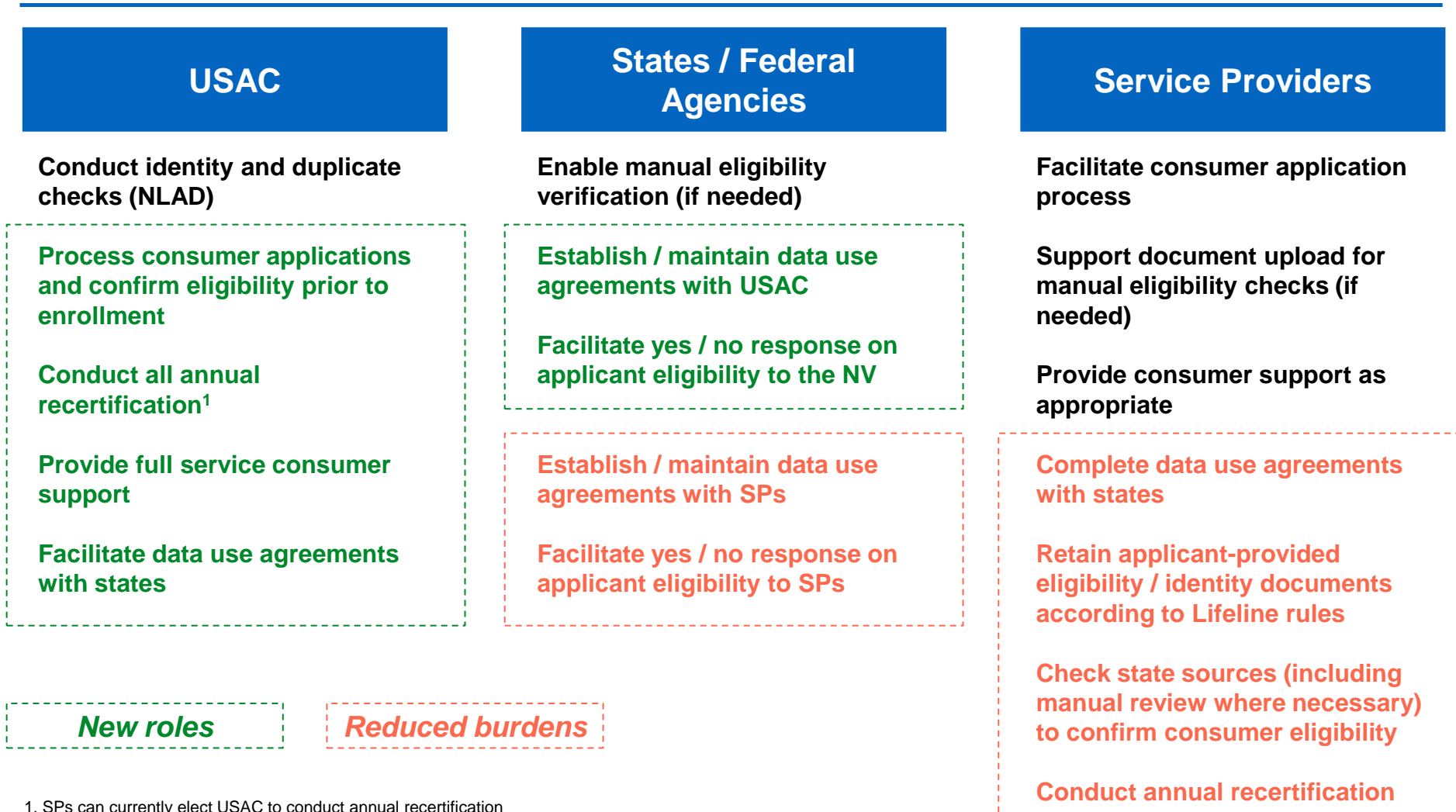
**Automate de-enrollment of subscribers due to non-response for self-certification**



**Unified NLAD / LED systems streamline ability to tie disbursements directly to subscribers claimed in NLAD**

# With the implementation of the National Verifier, the roles of key Lifeline stakeholders will shift

**Eligibility verification must shift from Service Providers to USAC**



1. SPs can currently elect USAC to conduct annual recertification

# The National Verifier will also change key processes (1/3)

## Process example: Enrollment

**Enrollment:** Going forward, all consumers must verify their eligibility through the National Verifier before receiving Lifeline benefits.

- Applicants will provide the NV with their personal information either directly or through a Service Provider.
- The NV will interface with federal / state data sources to verify eligibility; as needed, the NV will conduct manual review of applicant-submitted documents.
  - NV will also conduct identity verification and duplicate subscriber / address checks.
- Similar to current practice, Service Providers will enroll approved applicants in NLAD; going forward, only applicants verified by the NV can be enrolled in NLAD.
- In order to allow consumers time to choose a Lifeline Service Provider, the NV's determinations of eligibility will be valid for 90 days once issued.



# The National Verifier will also change key processes (2/3)

## Process example: Recertification

**Recertification:** All subscribers must annually recertify directly through the NV to continue to receive Lifeline.

- At least 90 days (but not more than 150 days) prior to the service initiation date anniversary, the NV will attempt to recertify all subscribers by checking automated data sources.
  - No further action is required from subscribers found through automated verification.
- The NV will reach out to subscribers who could not be automatically verified through several channels (e.g., mailing and reminder texts, calls, etc.) to complete self-certification.
  - Subscribers will have many channels (e.g., phone, mail, web) through which they can complete self-certification.
- The NV will keep SPs apprised throughout this process and will automatically de-enroll subscribers who fail to recertify.
- Consistent with the Lifeline program rules, USAC, through the NV, reserves the right to perform ad hoc eligibility verifications on any subscriber at any time, above and beyond the annual recertification process.

# The National Verifier will also change key processes (3/3)

## Process example: Payment

**Payment:** Once the NV is operational, each Service Provider will be paid exclusively based on the record of its subscribers in NLAD.

- Service Providers will continually update NLAD to ensure that it is an accurate record of subscribers enrolled in Lifeline.
- NLAD will produce a "snapshot" report on the 1st of each month and request Service Providers to certify the list.
- Service Providers will be paid based on that certified list of subscribers, rather than based on the 497 form (as is current practice).

# These updated processes will require a build of new integrated eligibility systems...

## Eligibility

### Lifeline Eligibility Database (LED)

- One eligibility engine with many functions:
  - Query qualifying program data sources to determine eligibility;
  - Store yes / no eligibility results; and
  - Queue applications to BPO for manual review when necessary<sup>1</sup>
- Portals for eligibility verification (e.g., consumer web portal, batch uploads)

***New build required***

## Enrollment

### National Lifeline Accountability Database (NLAD)

- Database of all enrolled Lifeline subscribers for calculating payments to SPs;
- Services to check duplicate subscribers / addresses and verify identity; and
- Portal for subscriber updates

***Updates required***

**From a technical standpoint, LED and NLAD will be tightly integrated as part of the single National Verifier solution to ensure a streamlined experience**

1. For example, income verification or when applicant not found automatically in federal / state data sources

## ...and the addition of new capabilities

New capabilities will come from both internal and external sources

### USAC capabilities

#### USAC / Lifeline team

**Rigorous vendor management**

**Additional capacity for stakeholder engagement and development of data use agreements**

**Complex project planning and KPI tracking**

**Additional advanced data analytics to detect waste, fraud, and abuse**

### Vendor capabilities

#### Systems integrator

**Build the National Verifier with all capabilities required to enable the timely and successful completion of its goals**

**Build the National Verifier to comply with all applicable security- and privacy-related standards and regulations**

**Test the National Verifier systems to ensure an optimal user experience**

*Procured by Jan. 2017*

#### BPO provider

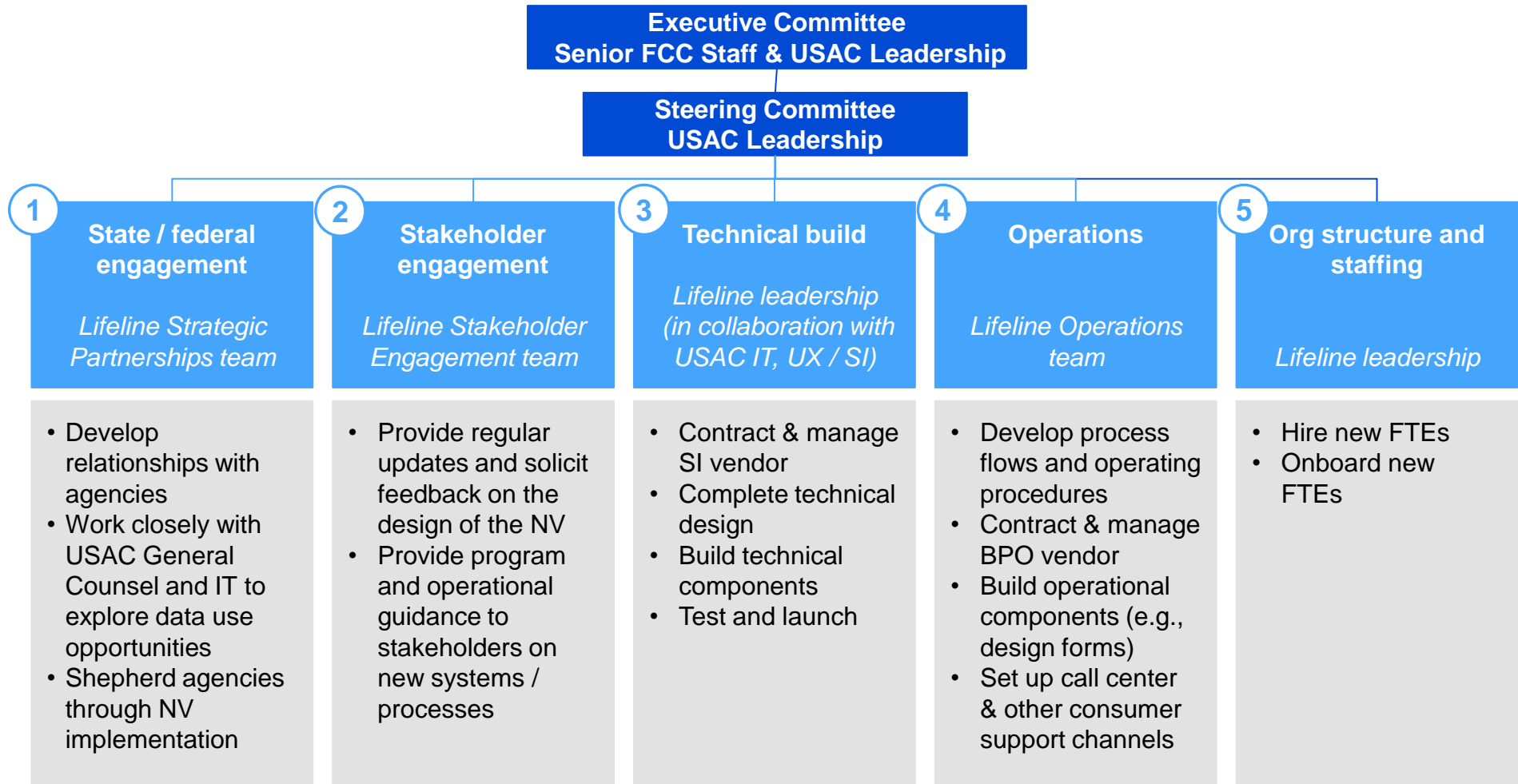
**Manual processes and consumer call center to:**

- Conduct manual eligibility reviews when automatic checks are not available
- Receive and process mail-in applications and IVR recertifications
- Support communication methods (e.g., mail recert. notices)

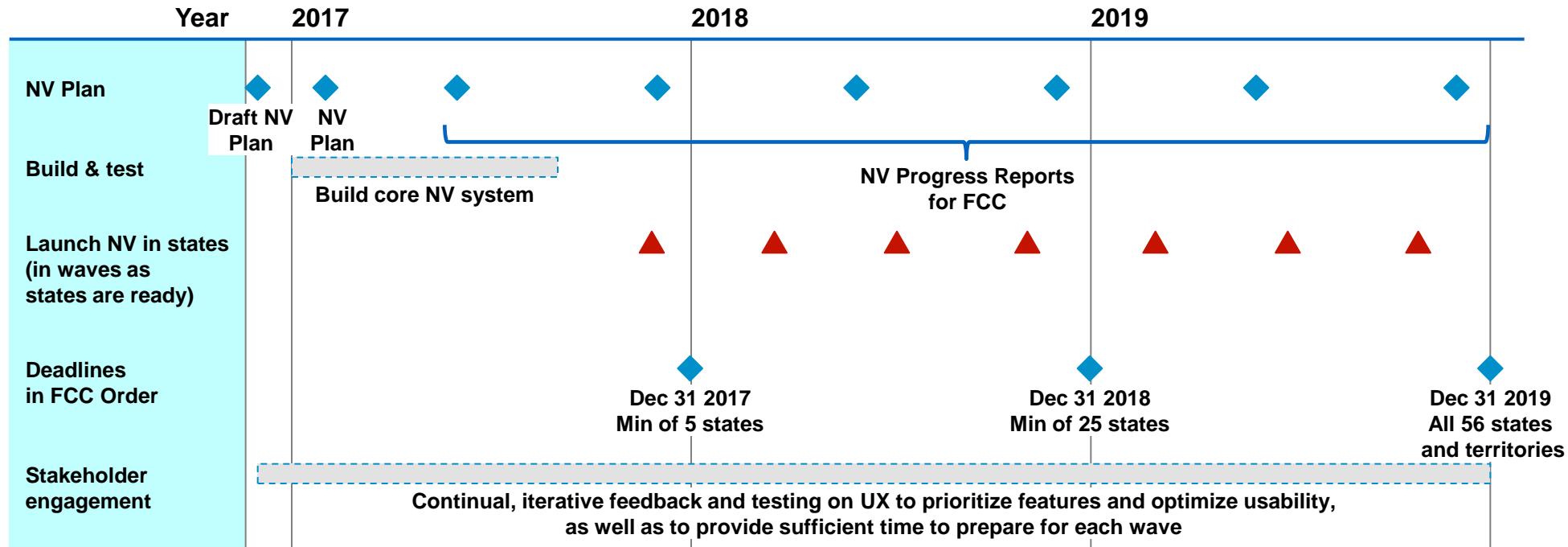
**General consumer support, including for all dispute resolutions**

*Procured in early 2017*

# These changes will be managed by an FCC / USAC governance structure



# The National Verifier will be launched in multiple waves as states are ready over the next three years



**The National Verifier Plan will be continuously updated and published every 6 months**

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## Stakeholder engagement: Executive summary

**Proactively engaging key stakeholders is critical to the success of the National Verifier.**

- Stakeholder feedback helps to understand the opportunities and implications of the National Verifier for those who will interact with it regularly.

**USAC sought extensive feedback from three key stakeholder groups:**

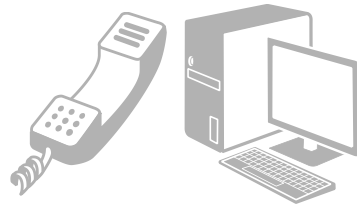
- Service Providers
- Consumer groups
- State and federal partners

**USAC solicited feedback on NV through regular calls, meetings, and web channels to better understand each stakeholder's potential concerns.**

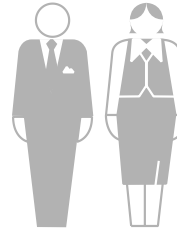
**Initial feedback was incorporated into this NV plan, and USAC will continue to solicit and incorporate feedback as it designs NV systems and processes.**

# Three key stakeholders were engaged for the National Verifier Plan

## Service Providers



## Consumer groups



## States / federal agencies



## Stakeholder primary interests

**Simple systems / processes**

**Minimizing business process disruptions**

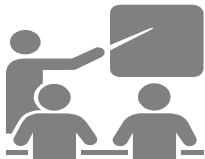
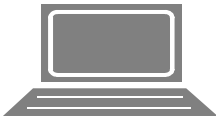
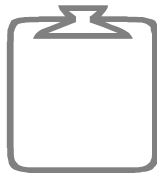
**User-friendly interfaces**

**Maximizing access for all consumers**

**Data use and storage**

**Protecting data (privacy, security)**

# We used three main communication channels to solicit feedback from stakeholders

	Targeted Interaction	Broad Interaction	Newsletter / Website
			
<b>Stakeholders</b>			
<b>Service Providers</b>	<ul style="list-style-type: none"> <li>Individual and small group workshops to better understand potential implementation challenges</li> </ul>	<ul style="list-style-type: none"> <li>Webinars to provide updates on NV and seek feedback</li> </ul>	<ul style="list-style-type: none"> <li>Bi-weekly newsletter to share NV implementation information and decision points</li> <li>Website with continual updates to reflect latest on NV and any need-to-know information                             <ul style="list-style-type: none"> <li>Includes blog posts</li> <li>Includes information on how to reach USAC and participate in ongoing stakeholder outreach activities</li> </ul> </li> </ul>
<b>Consumer groups</b>	<ul style="list-style-type: none"> <li>Participation on NASUCA calls to understand consumer challenges</li> </ul>	<ul style="list-style-type: none"> <li>Webinars to provide updates on NV and seek feedback; focus on groups assisting with applications</li> </ul>	
<b>States / federal partners</b>	<ul style="list-style-type: none"> <li>Individual calls to understand unique circumstances</li> </ul>	<ul style="list-style-type: none"> <li>Webinars to provide updates on NV, seek feedback, and share best practices across states</li> <li>Participation in NARUC conferences</li> </ul>	

**We will continue to solicit feedback through these channels throughout the development of and transition to the NV**

## We heard several concerns from stakeholders and will address initial feedback (1/2)

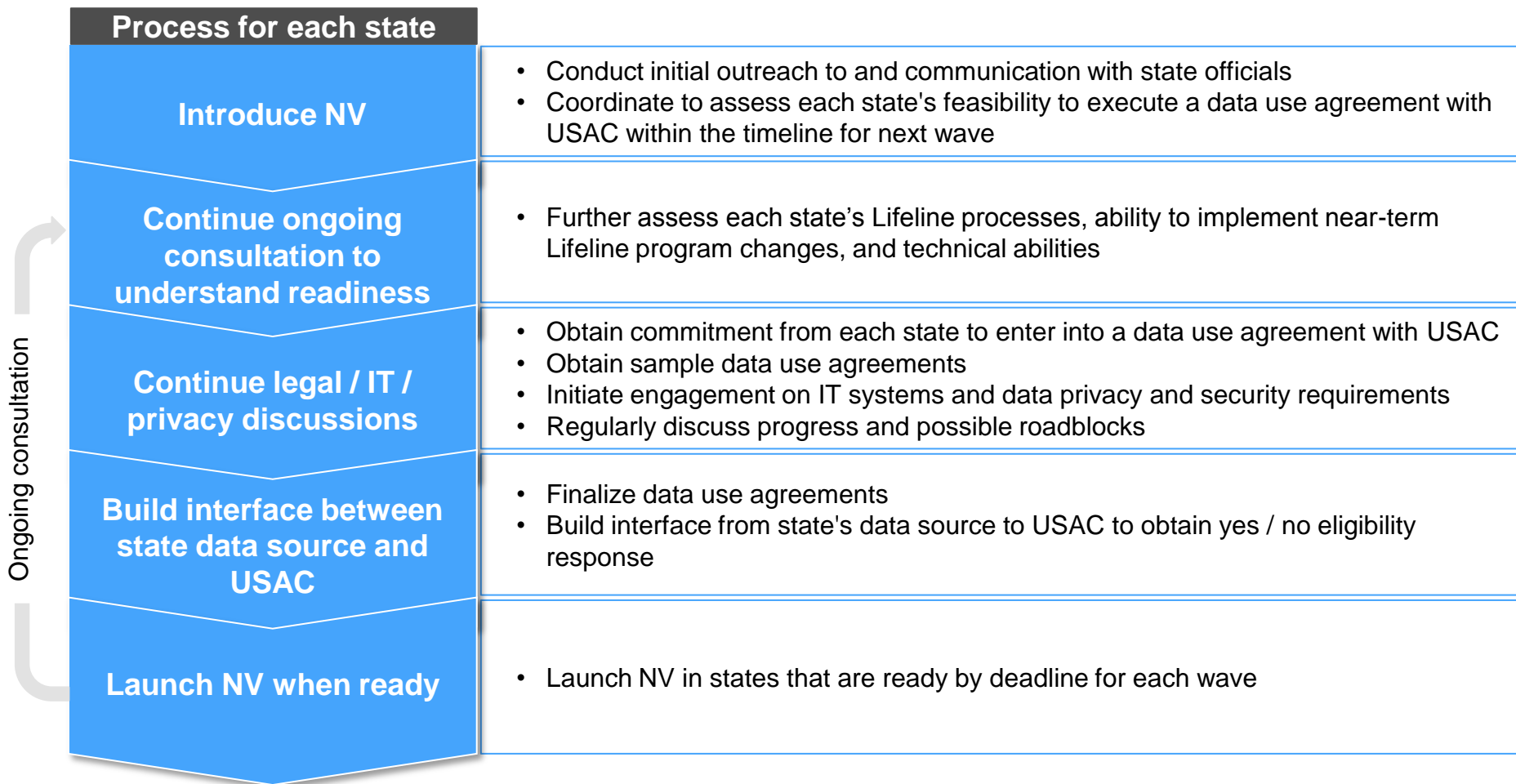
Feedback provided by:	Potential concerns	How feedback will be addressed
Service Providers	Potential for business process disruption	NV systems will be designed to be compatible with SP systems (USAC will ensure time for system testing prior to full launch).
	Maintaining relationships with Lifeline consumers	SPs will be able to interact with consumers in program application and recertification processes (i.e., using APIs or co-branding outreach).
	Speed at which the NV will be able to provide eligibility decisions	Eligibility determinations will be automated as much possible by investing resources in developing data use interfaces where possible.
	Challenges supporting consumers in tribal areas	USAC is working with tribal organizations to understand tribal consumer needs.
	Clear requirements of Service Provider responsibility	USAC will provide detailed operational guidelines for all SPs well in advance of NV launch.
	Navigating different state and federal requirements	The NV will be designed to create a streamlined process for SPs, regardless of unique state or federal requirements being met behind the scenes by the NV.
	Lifeline consumer support channels	The NV will have web channels and a call center to provide consumer support.

## We heard several concerns from stakeholders and will address initial feedback (2/2)

Feedback provided by:	Potential concerns	How feedback will be addressed
Consumer groups	Educating consumers on this significant transformation	USAC is partnering with advocates to prepare consumer facing materials and learn about available channels.
	Leveraging social service or community entities to aid in consumers navigating the program	USAC is researching and reaching out to consumer groups who already interact with this population <b>in order to get insights from current consumer users</b> .
	Creating a positive consumer enrollment experience	UI will be designed to be user friendly for all (e.g., multiple intake methods and languages).
States / federal partners	Security and privacy of eligible consumer data	The NV will only collect what is absolutely necessary to determine eligibility, seeking only yes / no verification responses as often as possible, with deep focus on security as discussed later in this plan.
	Alignment of the NV with existing processes or statutes	USAC is working closely with entities to understand their unique needs and circumstances and to create flexible processes with no “one size fits all” approach.
	Limited resources available to facilitate data usage	USAC is following a methodical approach to evaluate implementation timing for each entity.
	Cost to the agency to engage in implementation	The Modernization Order allows for addressing costs incurred by states and federal agencies.

## Deep dive: States and territories (1/2)

We are using an iterative, consultative process with each state to build a launch pipeline



**There will be multiple waves over the next three years so states can launch NV when they are ready**

## Deep dive: States and territories (2/2)

States have highlighted the need to discuss their costs of NV implementation

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**USAC is discussing cost considerations with states to develop the NV system and processes required to launch NV.**

**Each state falls along a spectrum of technical models**

- Some states already share data with Service Providers or other organizations
- Some states already have databases that consolidate data from all of the qualifying programs (e.g., Medicaid, SNAP, etc.)
- Some states currently have none of these capabilities

**Estimations of cost incurred by states to interact with the National Verifier will vary based on each state's technical model and other unique circumstances.**



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## Business architecture: Executive summary

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**The business architecture chapter captures, at a high level, each key process that the National Verifier will be required to complete.**

- The business architecture defines the key systems that underlie the NV and serves as a guide describing how key stakeholders will interact with those systems.

**We have created a list of 24 scenarios that the National Verifier will address and have drafted the high-level business architecture for each scenario.**

- We solicited and have received input from stakeholders on key external-facing scenarios (e.g., enrollment, recertification, payment).
  - We will continue to engage stakeholders as we refine the Plan.

# There are a variety of scenarios that underpin the high-level business architecture for the NV (1/2)

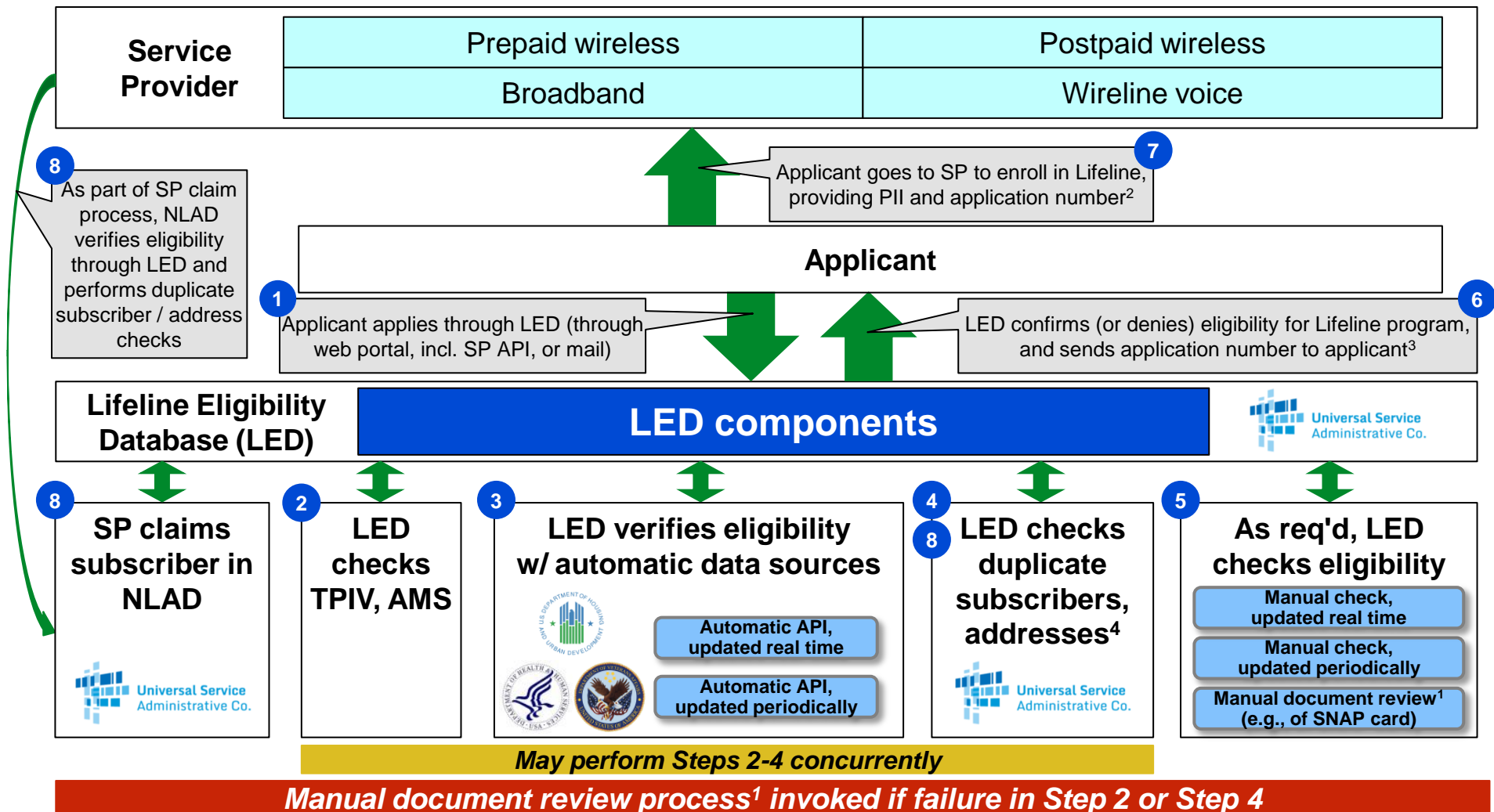
	Scenario	Slide #
Enrollment	① Individual consumer applies directly through NV (or through third party via provided API)	33
	② Batch enrollment through approved third party <ul style="list-style-type: none"> <li>• Service Provider</li> <li>• Aggregation projects</li> </ul>	35
	③ Application status check	36
	④ Tribal support entitlement (individual)	37
	⑤ Eligibility batch file upload process	38
Recertification	⑥ Individual subscriber recertifies	39
De-enrollment	⑦ De-enrollment process	39
Transfers	⑧ Service Provider transfer process	40
Account approval/mgmt	⑨ Approval / management of third-party accounts (e.g., SP, state / verifier partner)	41
Consumer info	⑩ Provision of information to consumers	42, 43
Updates	⑪ Subscriber information update process <ul style="list-style-type: none"> <li>• Address, name change, etc.</li> </ul>	44
Payment	⑫ Service Provider payment process	45
	⑬ Receipt of payment information from NLAD opt-out states	46
	⑭ SP payment review / correction process	47

# There are a variety of scenarios that underpin the high-level business architecture for the NV (2/2)

	Scenario	Slide #
Reporting / auditing	⑮ Reporting for USAC / FCC	48
	⑯ Reporting for state / federal partners	48
	⑰ Reporting for Service Providers	48
	⑱ Reporting for social service agencies	48
	⑲ Reporting for aggregation projects	48
	⑳ System failure notification	49
	㉑ Auditing process	50
Dispute resolution	㉒ TPIV / AMS / port freeze dispute resolution	51
	㉓ Eligibility dispute resolution	52
	㉔ Recertification dispute resolution	52

The rest of the slides in this section explain each scenario in detail

# Consumer verifies eligibility directly through NV (including through API provided to SPs); SPs enroll verified applicants



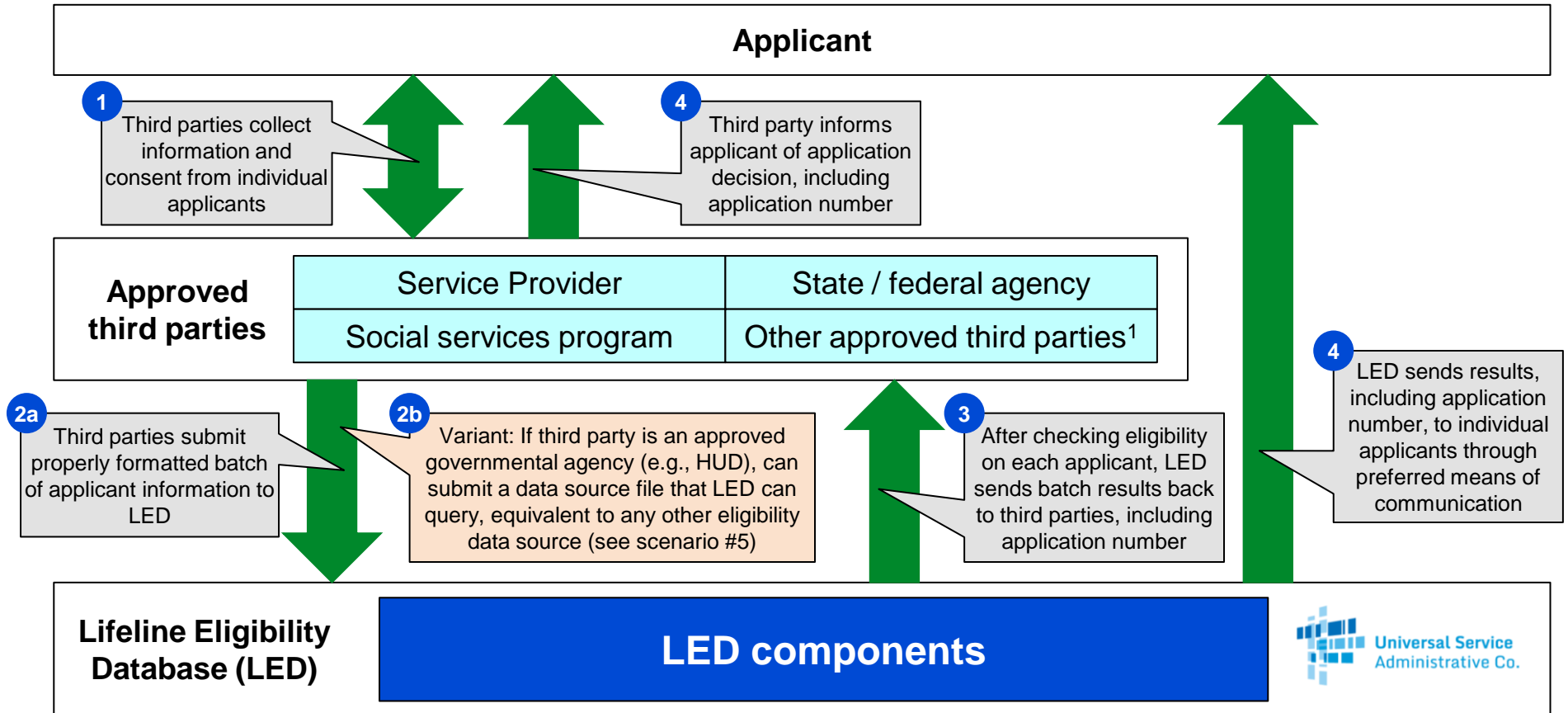
Note: Number balls represent steps in process; all actions on step 8 happen simultaneously 1. Eligibility and/or identity verified through document review at the USAC call center as failsafe process of last resort 2. Application number can be recovered online with applicant PII, as well as through the NV consumer call center 3. Eligibility determinations remain valid for 90 days 4. SPs are permitted to help applicants resolve failed duplicate checks through the NV (e.g. by assisting the consumer to fill out an IEH form in the NV system), in compliance with the Lifeline program rules, as well as NV guidelines to be issued by USAC.

# The Draft National Verifier Plan encompasses several types of automated and manual reviews

	Data freshness	Description
Automated	Real time	<ul style="list-style-type: none"> <li>Automated query of eligibility data source</li> <li>Data source updated in real time (most recent information)</li> </ul>
	Periodically updated	<ul style="list-style-type: none"> <li>Automated query of eligibility data source</li> <li>Data source may not have latest available information</li> </ul>
Manual <sup>1</sup>	Real time	<ul style="list-style-type: none"> <li>Manual check of eligibility data source</li> <li>Data source updated in real time (most recent information)</li> </ul>
	Periodically updated	<ul style="list-style-type: none"> <li>Manual check of eligibility data source</li> <li>Data source may not have latest available information</li> </ul>
	Documents	<ul style="list-style-type: none"> <li>Manual review of documents provided by applicant</li> </ul>

1. SLA for manual review to be determined; pursuing as close to real time as possible while considering cost and BPO capabilities

# Third-party batch application / eligibility verification process



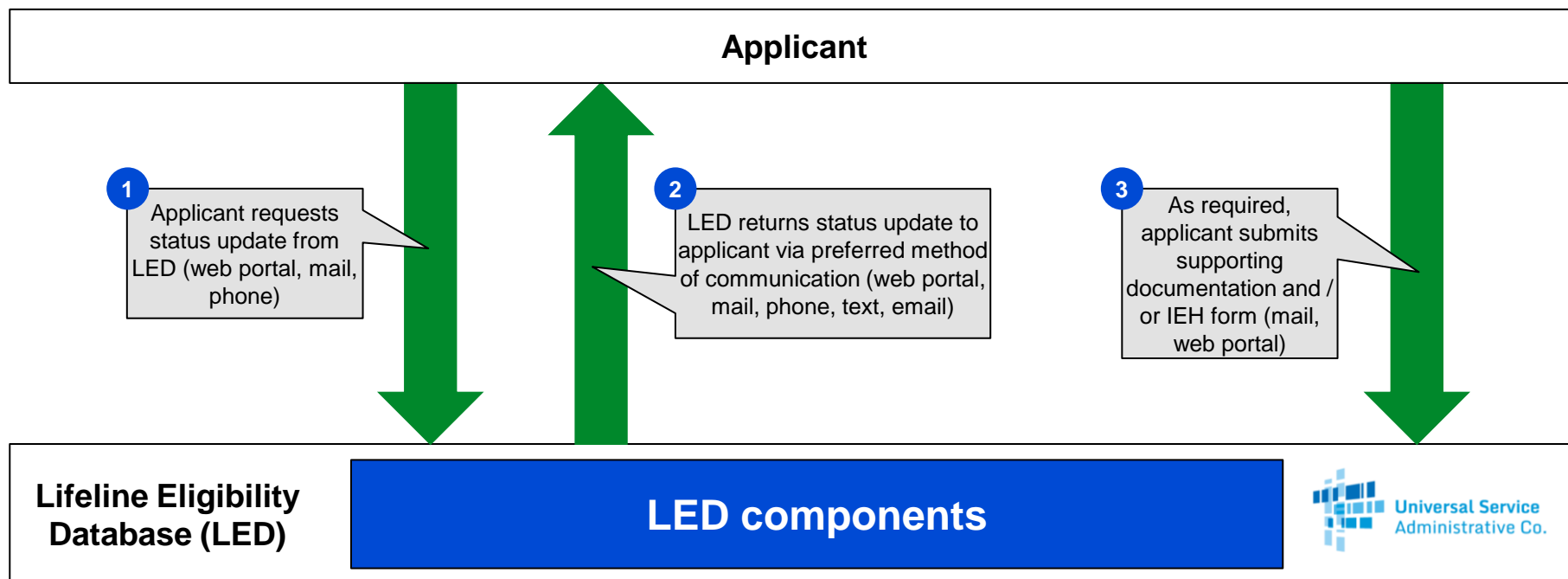
**Applicants requiring manual review will be rejected and must go through the individual application process**

1. As designated by USAC

Note: Both actions on Step 4 happen simultaneously; we are targeting near real time turnaround for all reviews

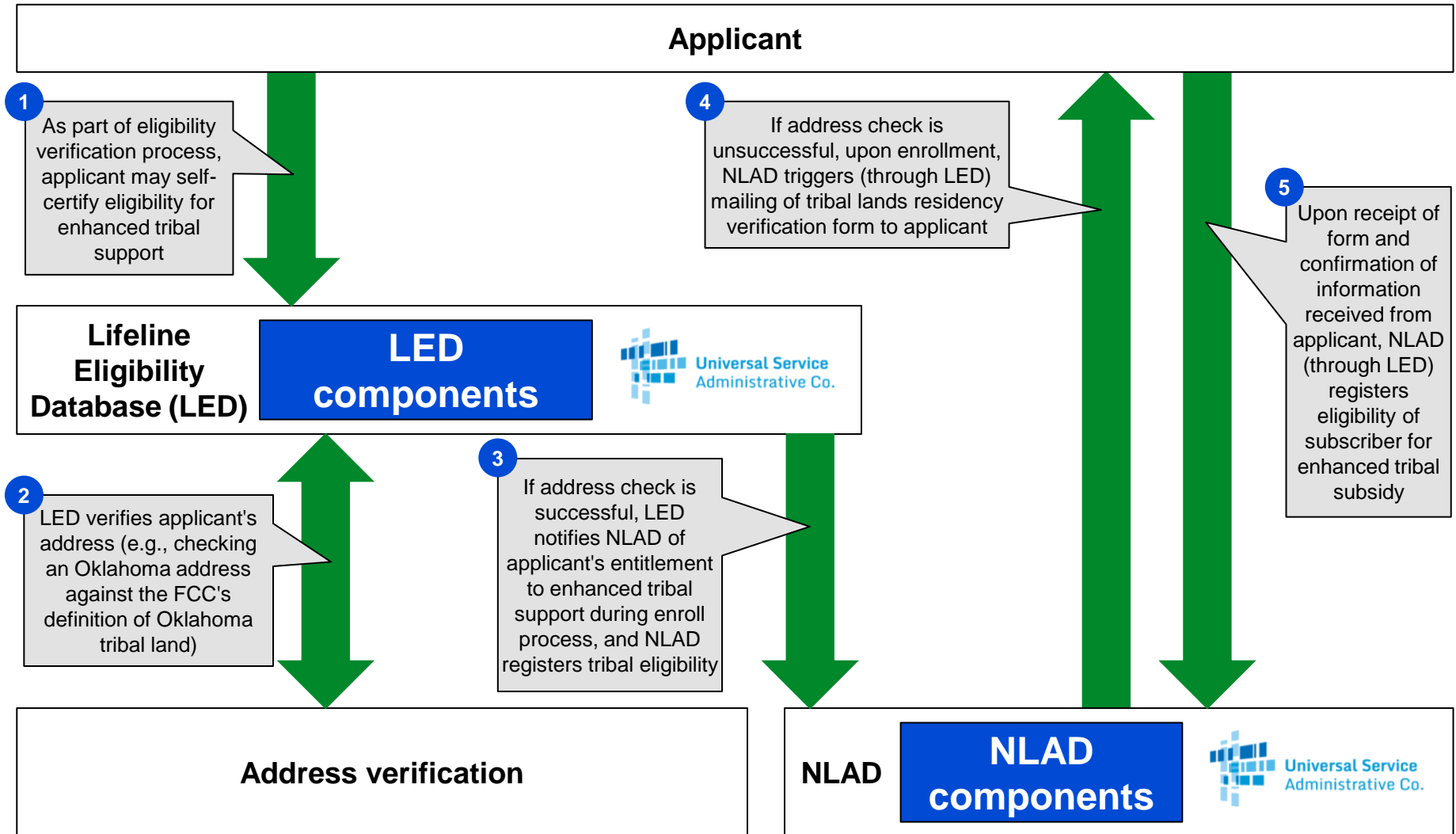


## Eligibility verification / application status check

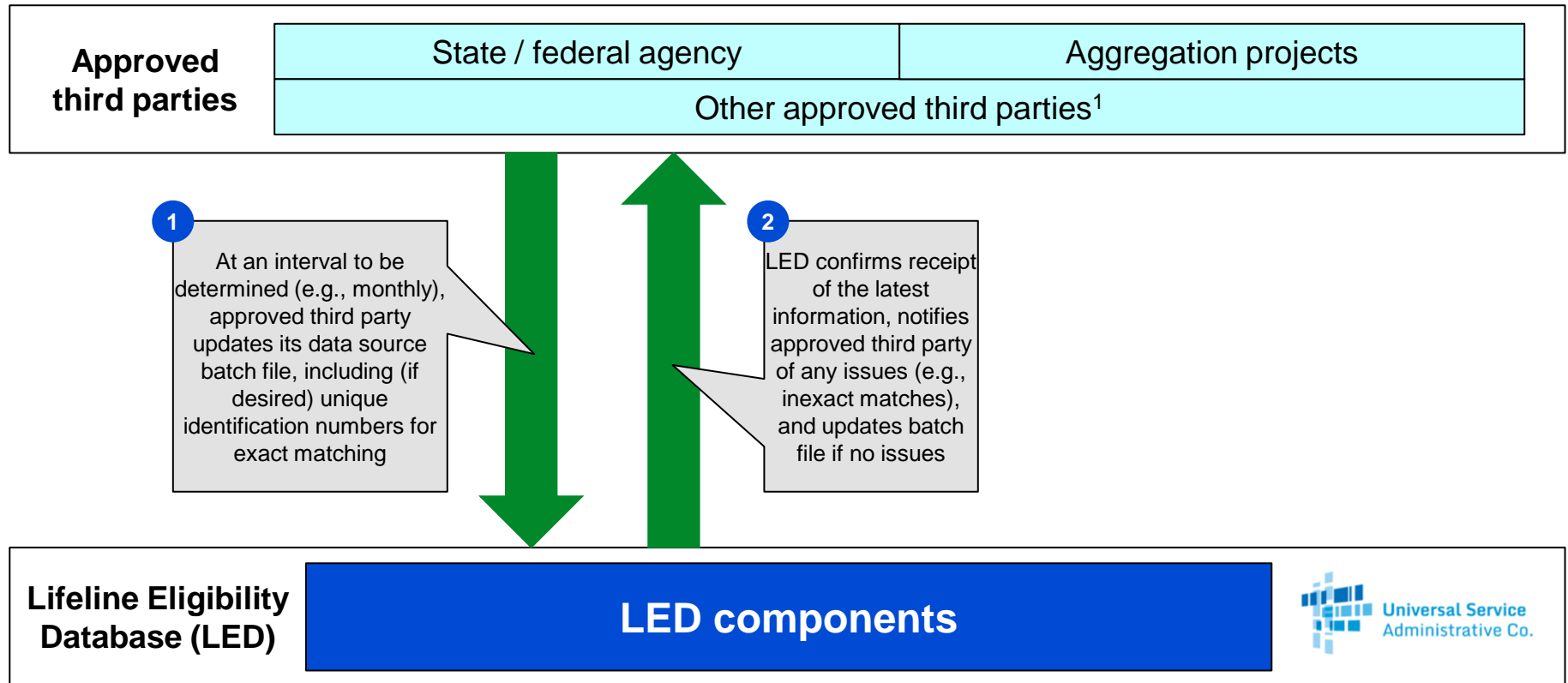


Note: Information available through status check likely to include application status, application number, update of preferred method of communication, functionality to submit documents required to continue in process (as required), IEH form submission (as required)

## Tribal support: Applicant self-certifies eligibility to receive enhanced tribal support subsidy



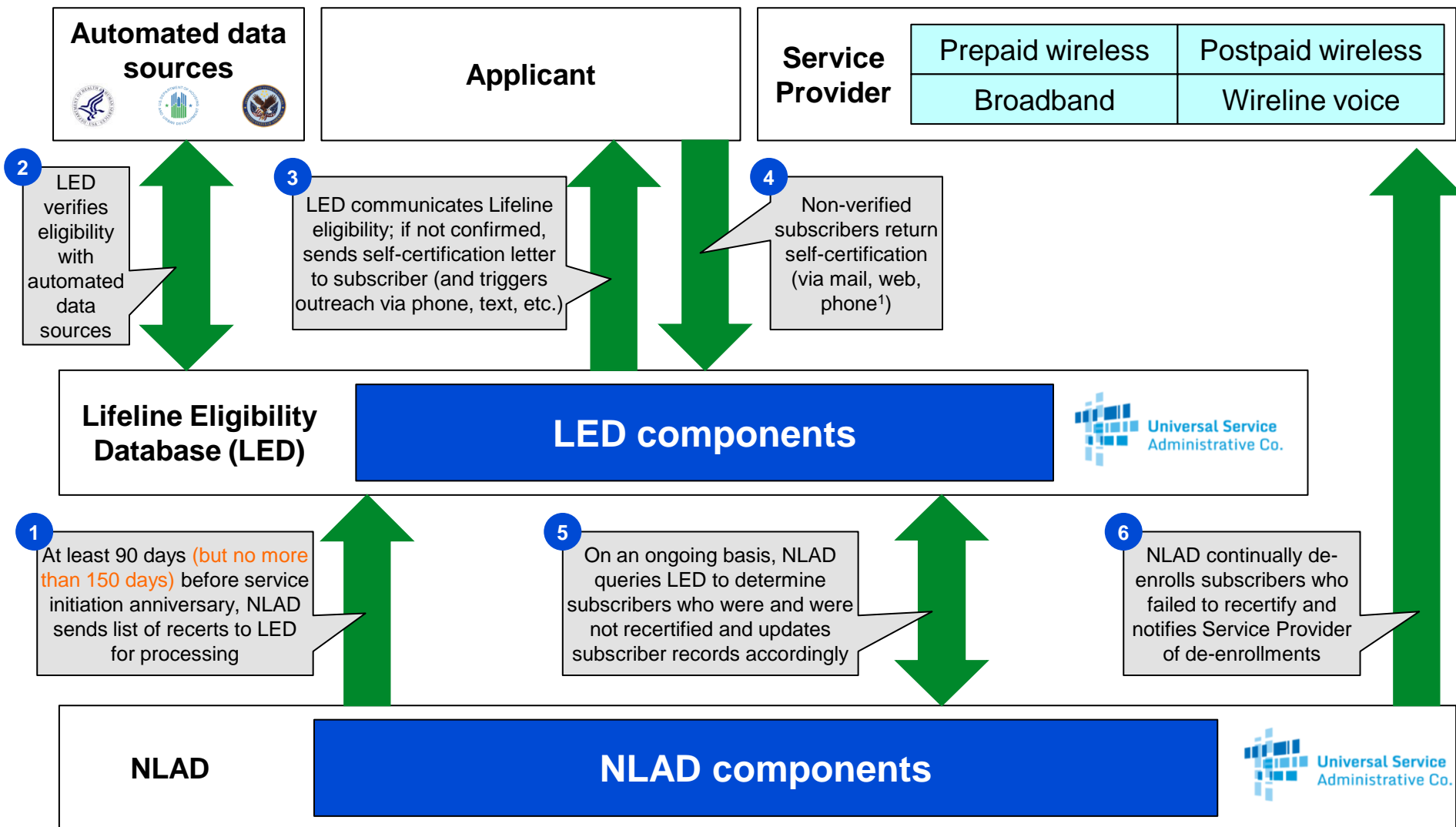
# Process to upload / update underlying batch files for periodically updated eligibility data sources



Note: May have different technical upload process dependent on file size

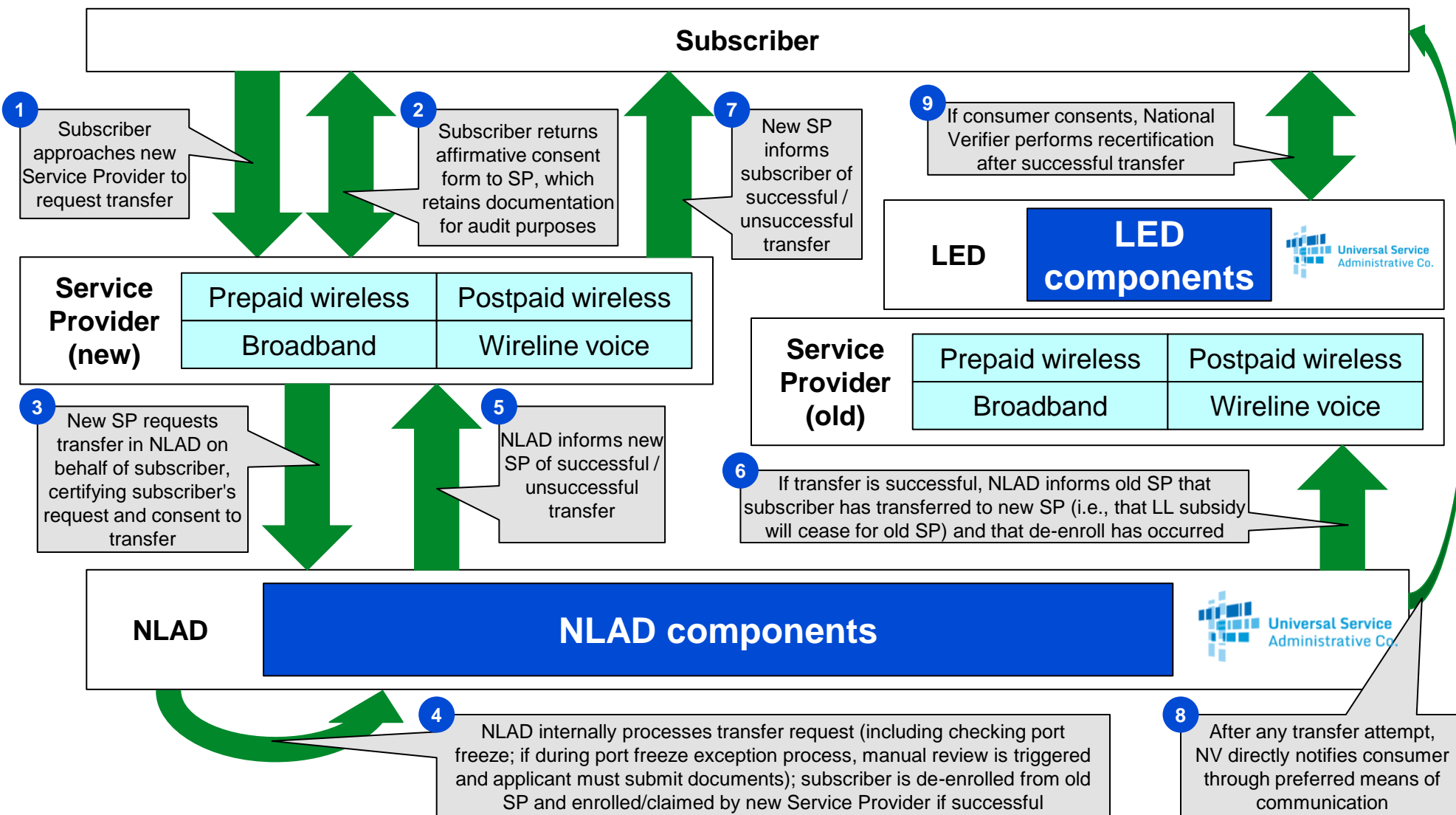
1. As designated by USAC

# Individual consumer annually recertifies eligibility (includes subsequent de-enrollment)

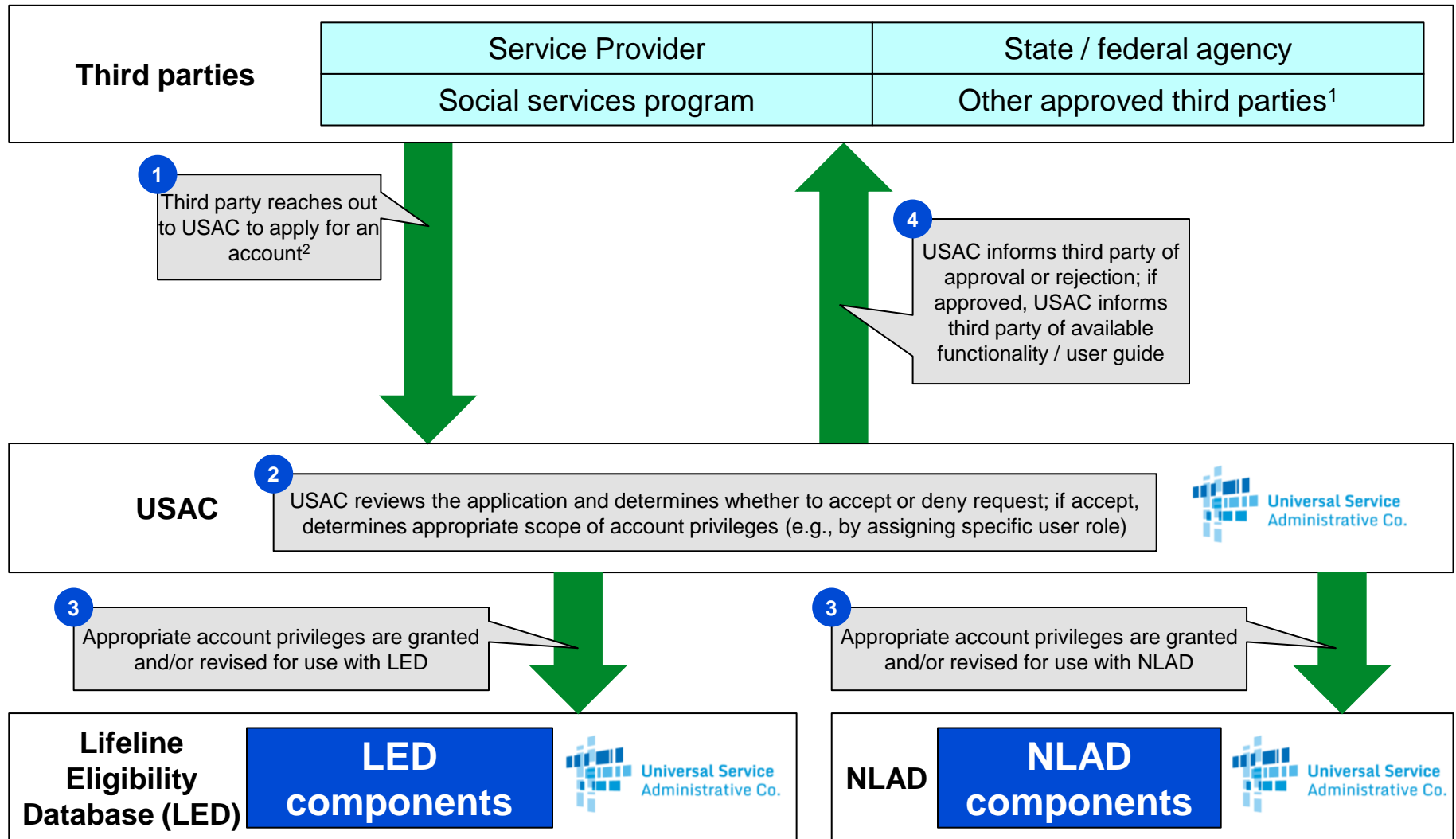


1. IVR (with call center backup)

# Benefit transfer: Subscriber requests transfer of Lifeline benefit to a new Service Provider

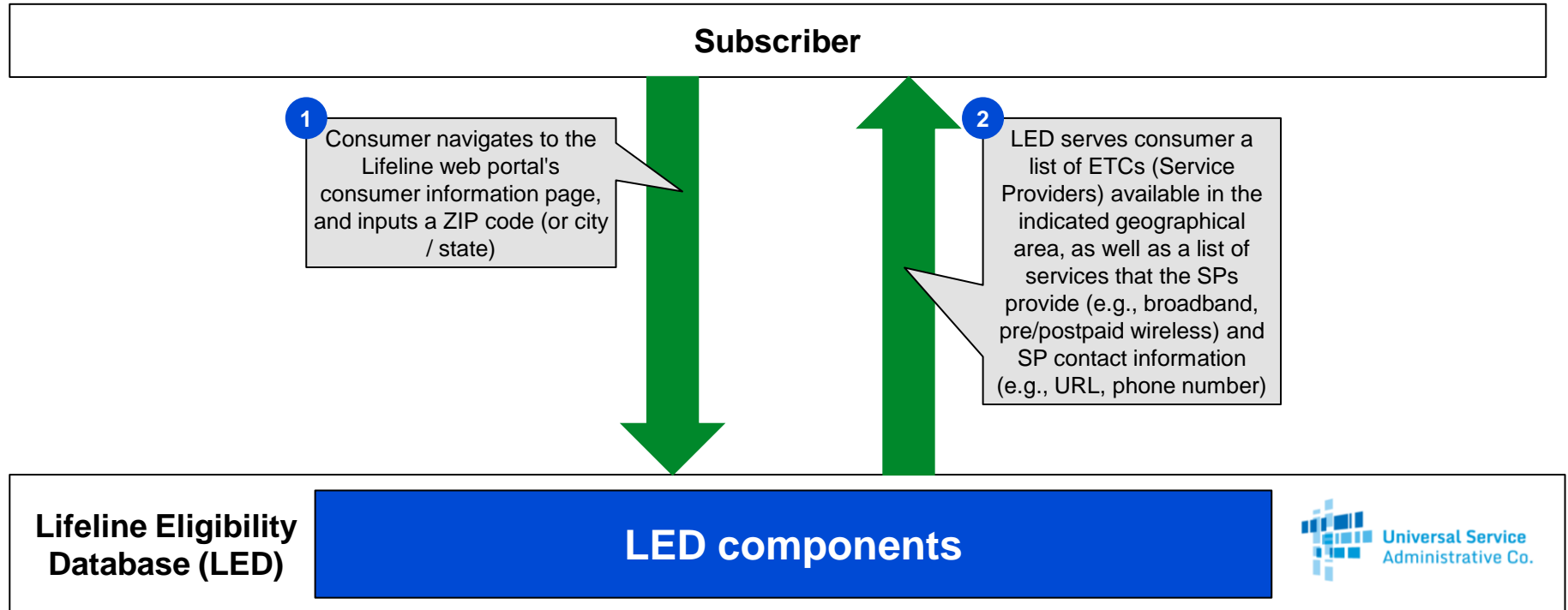


# Approval and management of third-party NV accounts (e.g., for SPs, social services agencies, states / verifier partners)

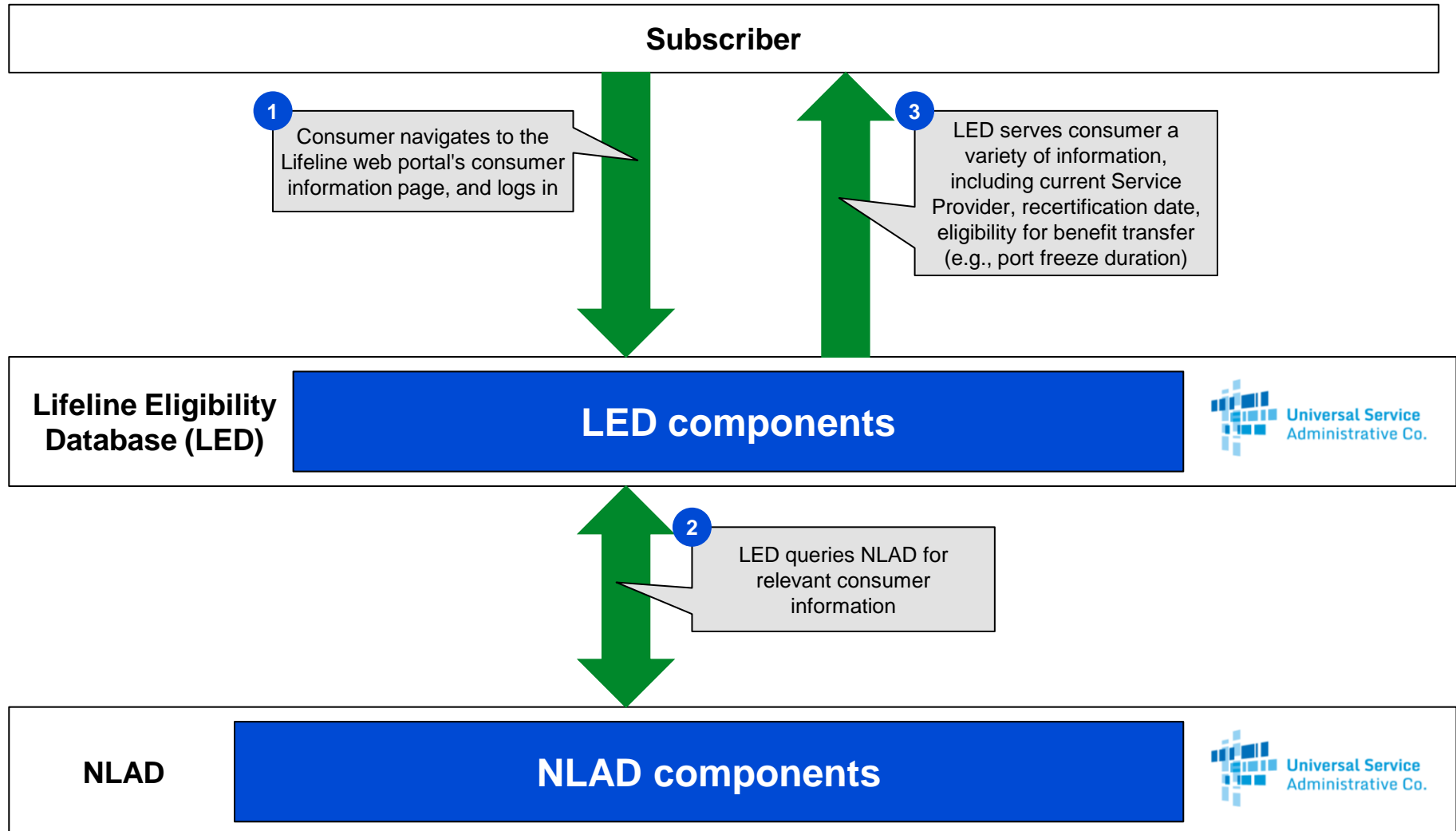


1. As designated by USAC 2. Service Providers will continue to apply through e-File

## Display of public consumer information (e.g., ETCs in a given geography)



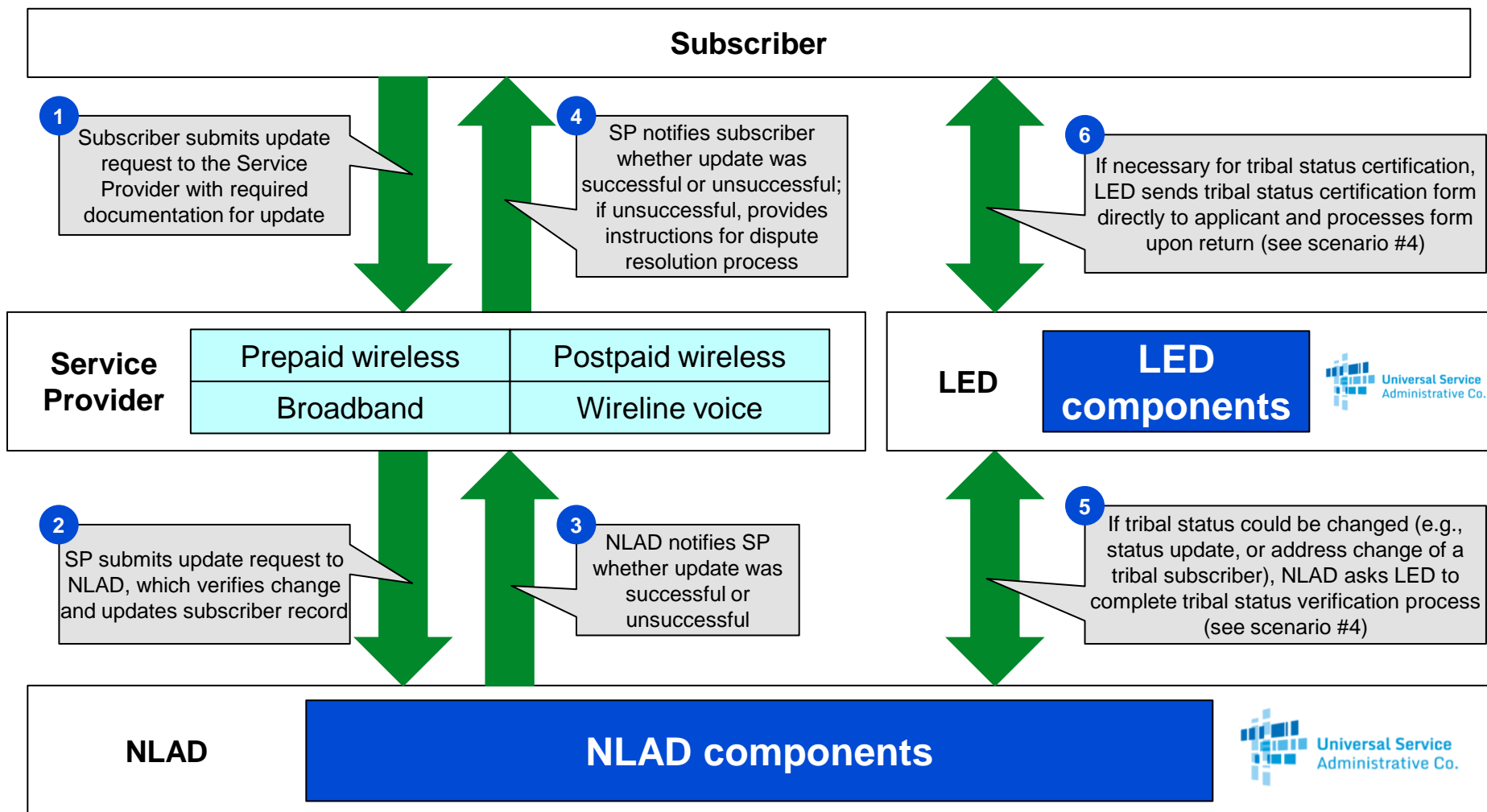
## Display of private information to consumer (e.g., current SP, annual recertification date, port freeze end date)



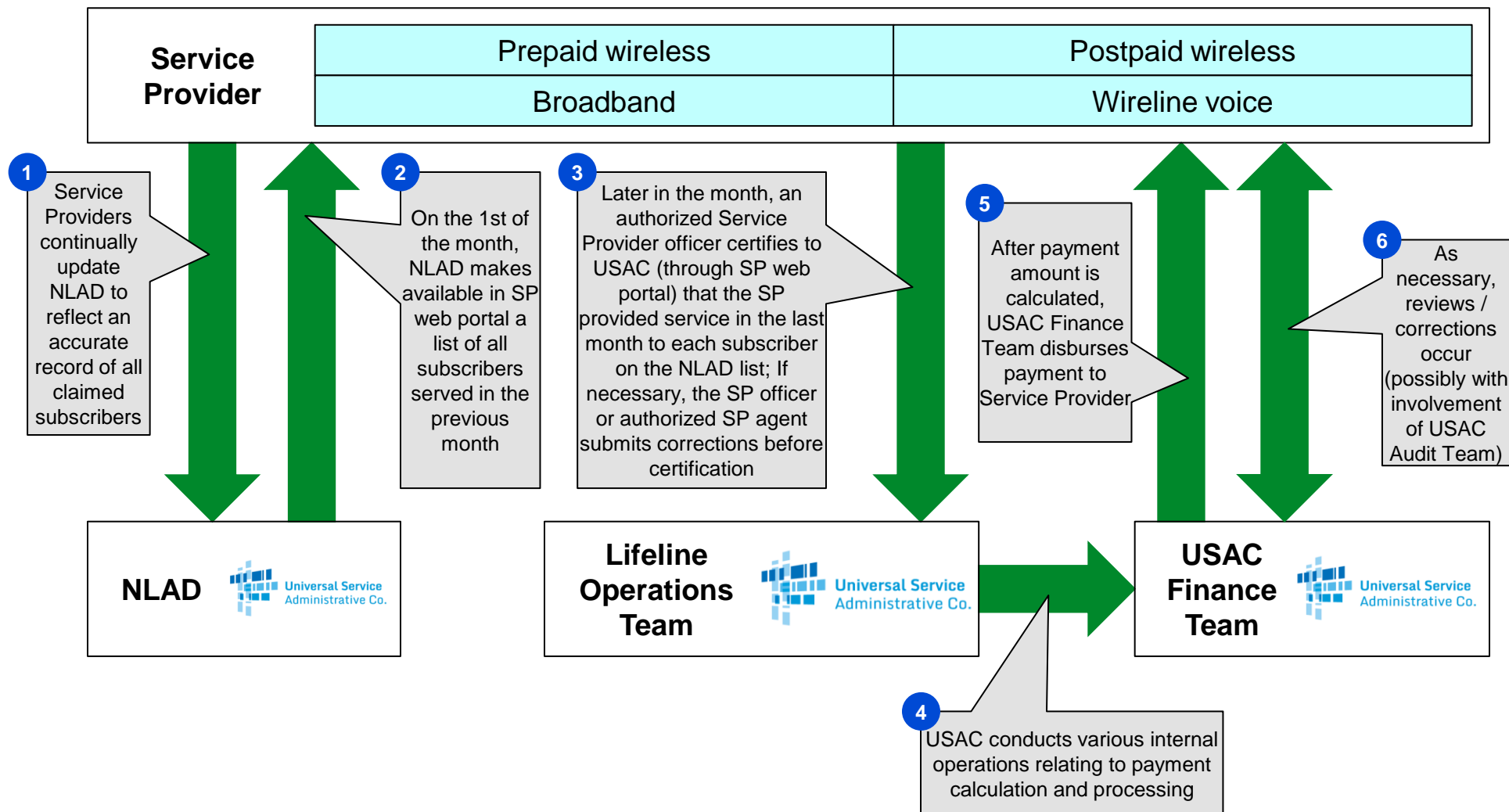
Note: Also possible to receive this information by contacting USAC Lifeline Consumer Support (i.e., call center)



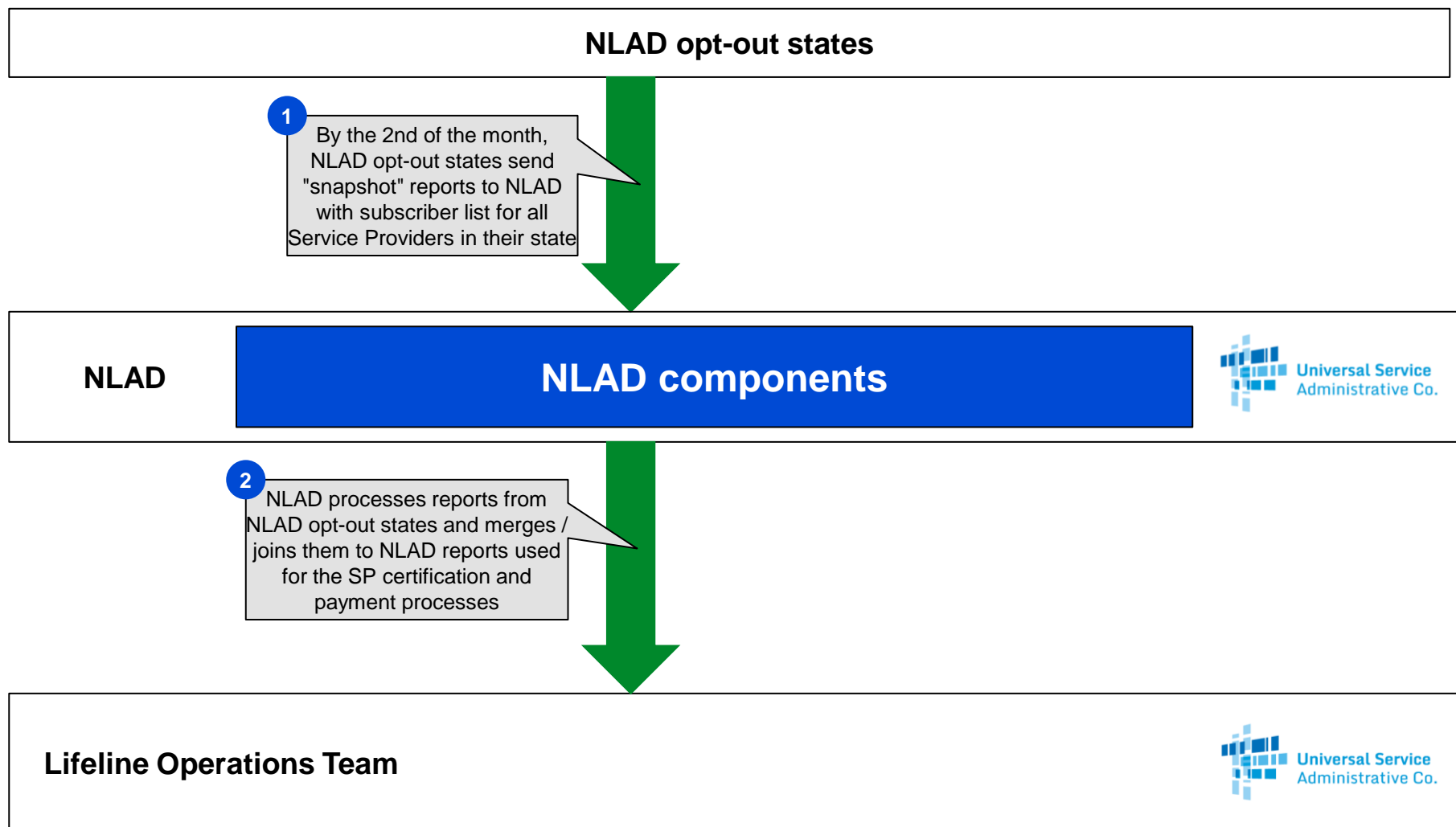
# Subscriber information update process (e.g., name change, address change, change to tribal status)



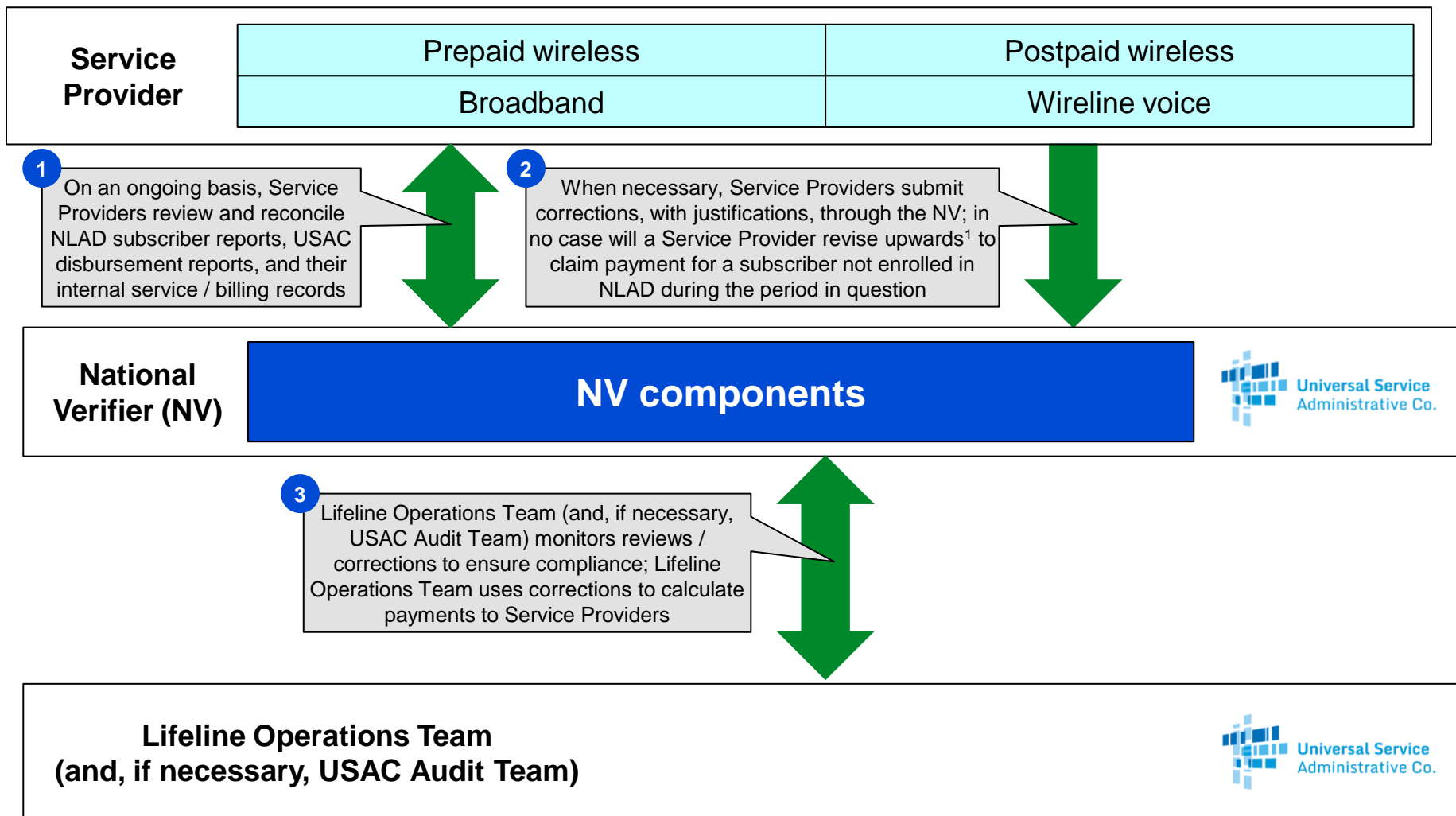
# Process for calculation and disbursement of subsidy payments to Service Providers



## Receipt of subscriber information (for payment calculations) from NLAD opt-out states

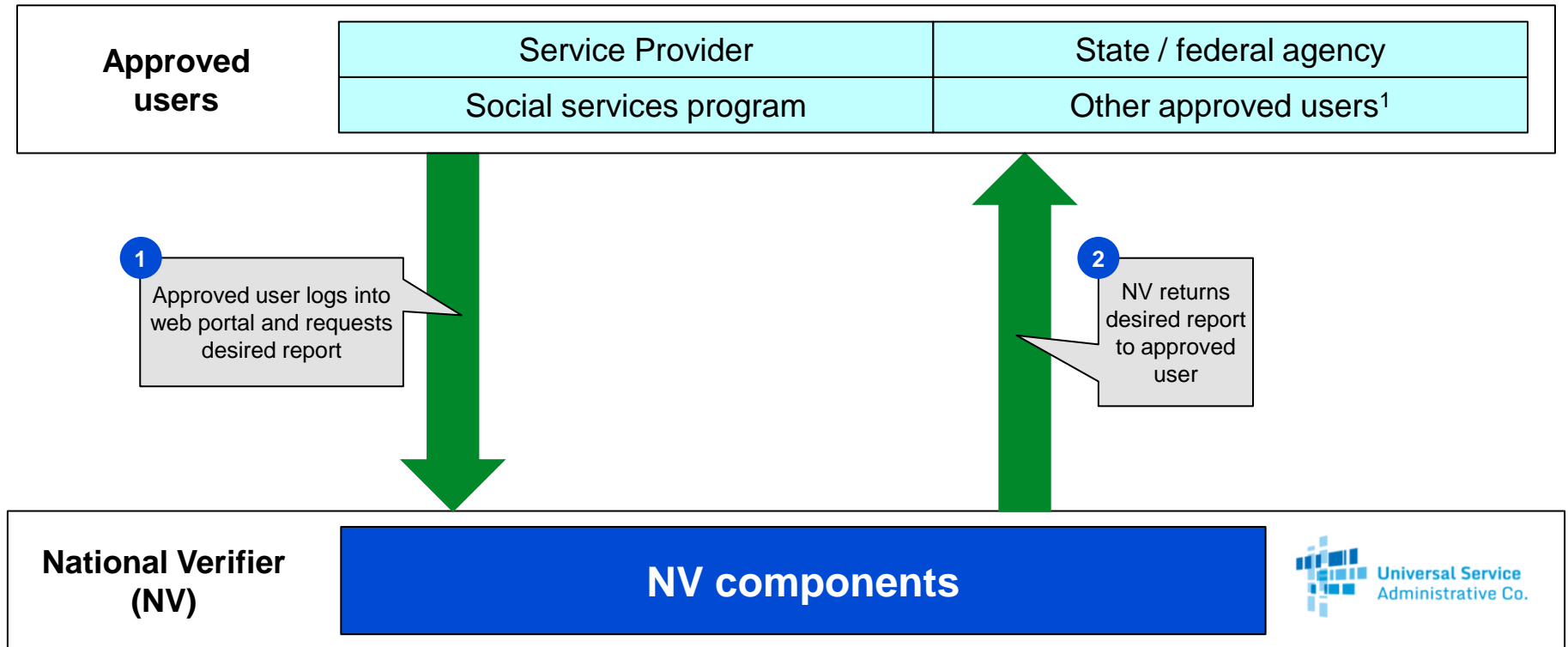


# Process for Service Providers to review and submit revisions / corrections to prior payments



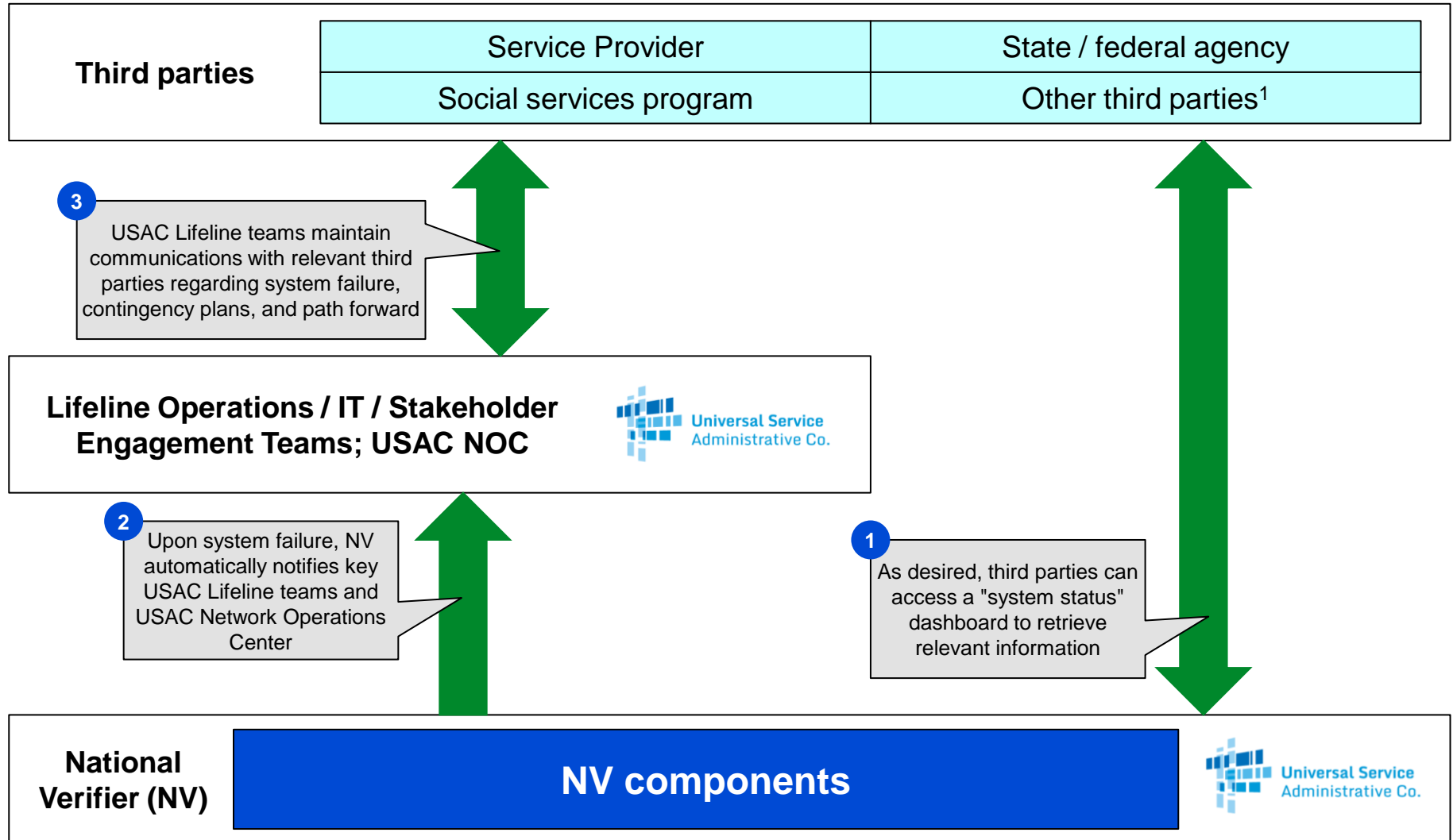
1. Service Providers can never claim payment for someone who was not on the "snapshot report" for a given month  
 Note: Disbursements to occur within regular payment cycles; revisions must take place within administratively mandated windows

## Reporting functionality



1. As designated by USAC

## National Verifier system(s) failure notification process



1. As designated by USAC

## Ongoing auditing process

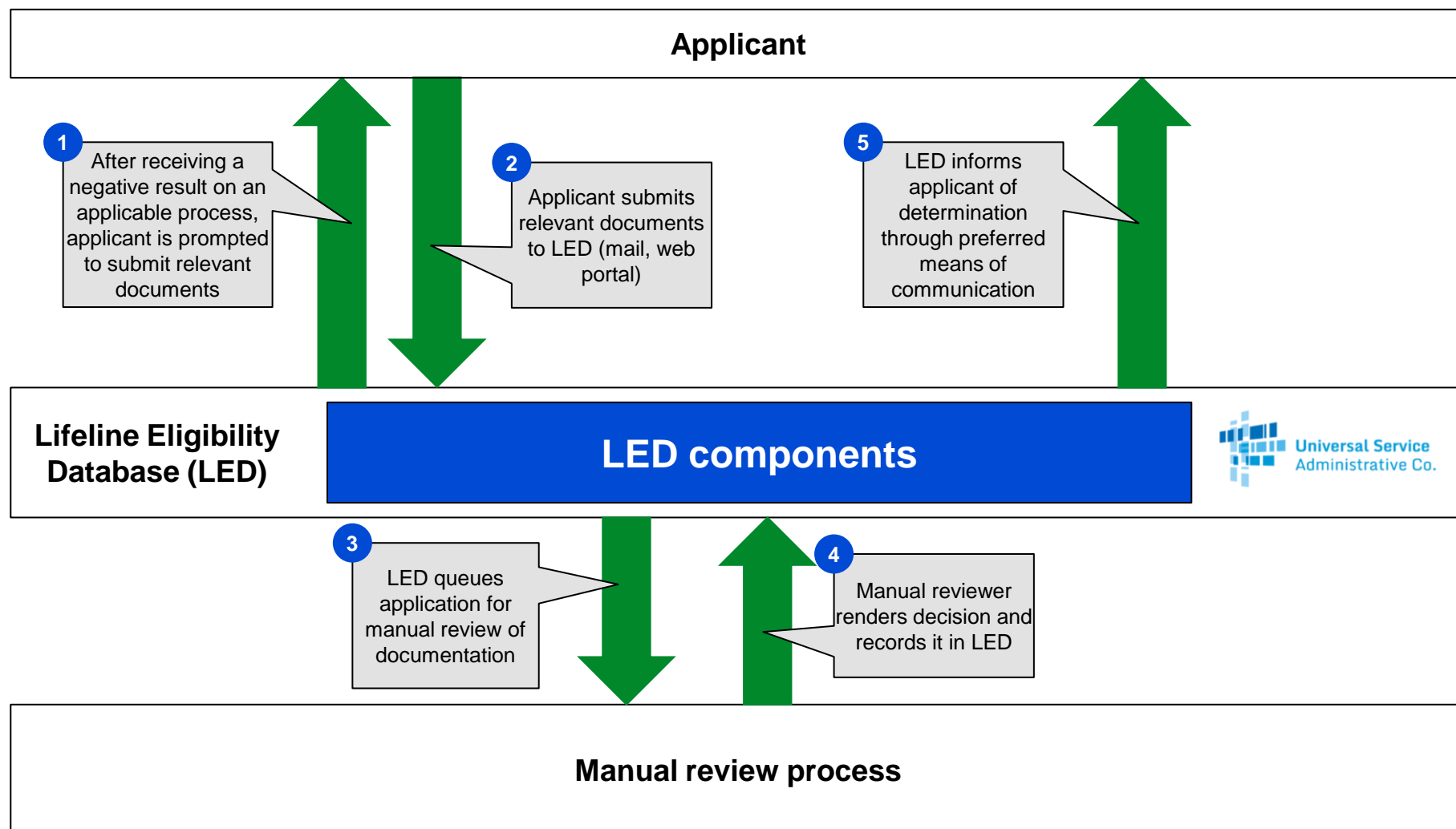
**Consistent with current practices, USAC and the FCC will continue to conduct audits and reviews with respect to the Lifeline program to safeguard the program. USAC's audit program includes three components:**

- Beneficiary and Contributor Audit Program (BCAP) – random, targeted and risk based audits, which obtain and review documentation from Service Providers to ensure overall compliance and recommend actions to increase future compliance.
- Payment Quality and Assurance (PQA) – statistically valid sample of specific payments made to Service Providers to determine if payments were made in accordance with FCC rules. Results are used to report improper payment rates.
- Corporate Assurance (CA) – assess the design of the National Verifier as to its functionality, integrity, confidentiality, and availability.

Currently, audits and reviews include validating the number of subscribers reported on the FCC Form 497, ensuring the eligibility of the Service Provider and the subscriber, ensuring appropriate pass through of the benefit from the Service Provider to the subscriber, and reviewing documentation evidencing required certifications.

**USAC will work with the FCC to update audit and review procedures to reflect the new requirements and National Verifier processes.**

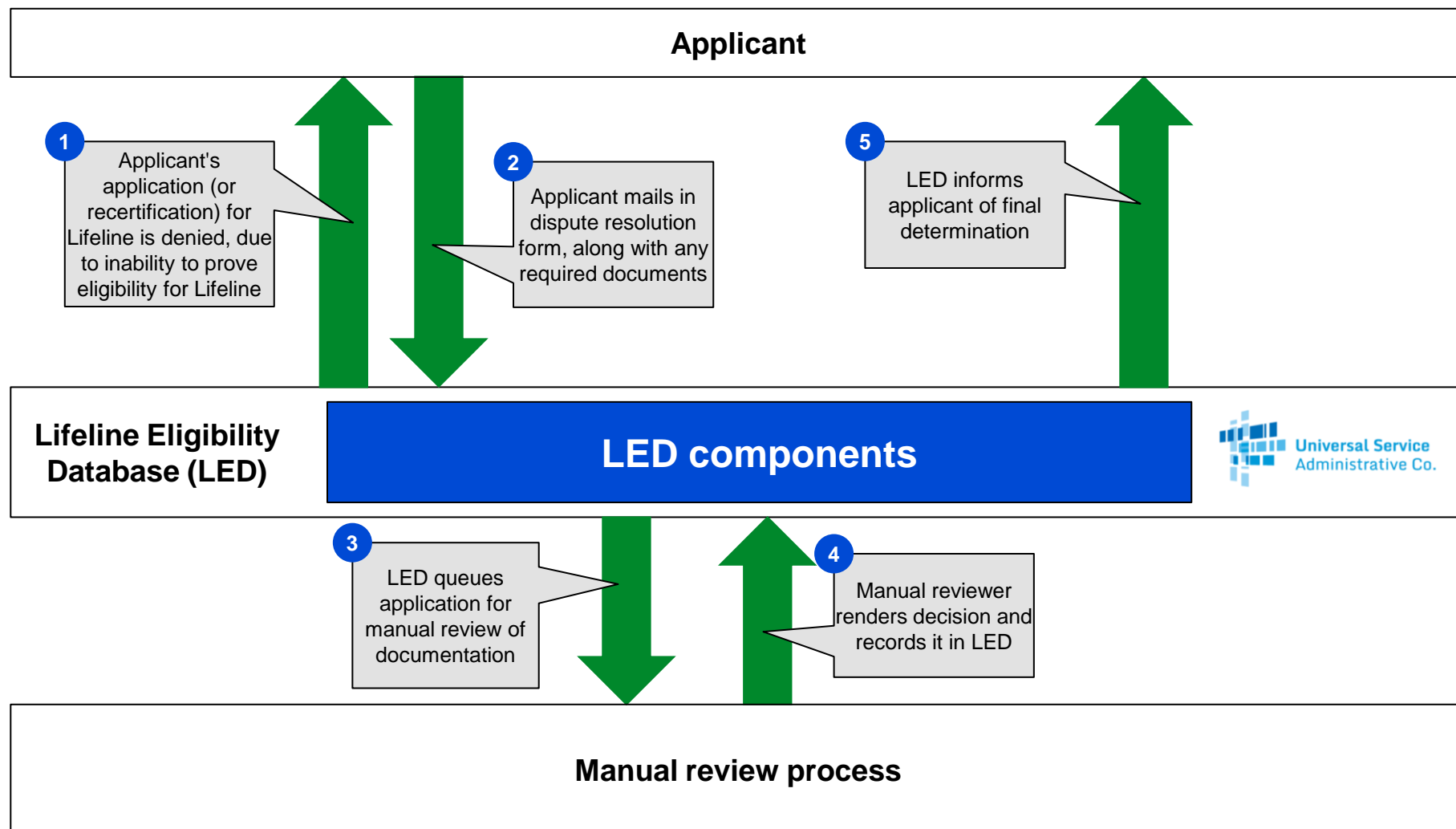
## TPIV / AMS / port freeze dispute resolution



Note: Dispute resolution is distinct from the standard manual review process, as dispute resolution occurs after the NV / USAC has rendered a formal decision (e.g. a decision that an applicant has failed TPIV after the standard manual review process, a determination of eligibility / ineligibility for Lifeline). Dispute resolutions and standard manual review will have distinct SLAs. SPs will likely be able to view the results of standard manual review and dispute resolution processes for their current subscribers, as well as applicants who applied through the SP's API.



## Eligibility / recertification dispute resolution



Note: Dispute resolution is distinct from the standard manual review process, as dispute resolution occurs after the NV / USAC has rendered a formal decision (e.g. a decision that an applicant has failed TPIV after the standard manual review process, a determination of eligibility / ineligibility for Lifeline). Dispute resolutions and standard manual review will have distinct SLAs. SPs will likely be able to view the results of standard manual review and dispute resolution processes for their current subscribers, as well as applicants who applied through the SP's API.

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## Data usage: Executive summary

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**This section describes the process for gaining access to the data required for eligibility verification of consumers applying to the Lifeline program.**

**This process culminates in agreements between USAC and the entities who maintain benefit data that can determine if an applicant is enrolled in a qualifying program.**

**These data use agreements set the standard for data usage, storage, privacy, security, and liability and will impact the design of the NV.**

**Developing, implementing, and maintaining the data use arrangements across all 56 states and territories is complex and will require close coordination with all parties, as well as strong project management at USAC.**

## The National Verifier interacts with distinct data sources to answer each question in the application process

Application question		Activity to complete	Data source
1	Does your personal information pass identity verification?	Check applicant PII against third party identity verification system (TPIV); conduct AMS verification	NLAD
2	Are neither you nor anyone in your household currently receiving Lifeline?	Check applicant PII against those already enrolled in Lifeline	NLAD
3	Are you eligible for the Lifeline program?	<b>1st Step:</b> Check applicant PII against automated data sources to determine if they are enrolled in a qualifying benefit program	<div> <b>1st Step:</b> Federal or state data sources of qualifying programs         </div> <div> <i>Focus of this section</i> </div> <div> <b>2nd Step (if necessary):</b> Eligibility documents from qualifying programs         </div>
4	Are you still eligible for the Lifeline program after one year?	<b>2nd Step (if necessary):</b> Conduct manual review to determine eligibility	

**USAC is actively pursuing connections to federal and state qualifying program data sources for automated eligibility verification**

## To obtain access to data sources, USAC has begun consultations with state and federal agencies

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**To satisfy the Modernization Order, USAC aims to automate eligibility verification as much as possible by developing data use agreements with state and federal agencies.**

- USAC has been reaching out to discuss the National Verifier with relevant state and federal agencies who administer qualifying programs.

**Agencies have provided insights to USAC about their requirements for conducting automated verification, including:**

- Data use and storage stipulations;
- Data security and privacy standards; and
- Technical requirements for connecting to data sources.

**USAC is in ongoing productive discussions with agencies on data use agreements.**

- Several agencies have shared examples of data use agreements used with Lifeline Service Providers or other entities.

# Achieving data use agreements with state and federal agencies is a complex process

## Complexities for developing data use agreements include:

- Each state and federal agency has different regulations and policies, which USAC is committed to meeting.
- Detailed legal and IT requirements require several rounds of discussion to fully understand the unique needs of each entity.
- The level of technical specification requirements included in each entity's data use agreements varies widely.
- Specifics of the data available from each entity must be fully understood to design and perform matching for a yes / no eligibility result.
- Not all entities use the same technical data usage / linking method (e.g., API vs. Batch<sup>1</sup>).

**USAC is preparing to manage this complex process**

## **USAC is working closely with state and federal agencies to manage this complex environment**

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**Many common requirements across entities can be aligned to standardize and streamline data usage processes.**

**For state or federal requirements that vary, USAC will aim to observe the strictest requirement when developing the NV to ensure compliance.**

**Short term, narrow use agreements for data sampling or prototyping can be created to test data matching or other technical approaches.**

**USAC is building a cross-functional team to develop data use agreements and maintain relationships with state and federal agencies to ensure compliance with data use agreements once finalized.**

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## Data security / storage: Executive summary

**Privacy and data security have been key considerations throughout the development of the National Verifier and its associated processes.**

- USAC's Privacy and Security Teams have been, and will continue to be, key contributors and integral partners throughout the design process.
  - USAC employs a Chief Privacy Officer and a Chief Information Security Officer to ensure compliance with all privacy and security requirements and recently increased capacity in those areas.
- USAC will ensure that the National Verifier adheres to all applicable federal and state security standards, inclusive of any vendors or contractors who may work on or with the NV.

**The National Verifier and its associated processes have been designed to minimize risks stemming from data storage.**

- The National Verifier will collect the minimum amount of data that is required to successfully execute on its goals.
- USAC will maintain an appropriate data retention policy for all applicant / subscriber data.
  - All data retention policies will comply with USAC and FCC records schedule(s).

## Data security: Design goals for the NV

- ✓ Work closely with USAC's Privacy and Security Teams (and, where needed, external experts) throughout the design process; going forward, we will continue to leverage them as an integral part of standing up the NV.
- ✓ Adhere to all state / federal requirements as outlined in any data use agreement(s) reached with data sources.
- ✓ Comply with all applicable federal data security and privacy laws, including working with the FCC to publish a System of Records Notice (SORN) in the Federal Register, conducting a Privacy Impact Assessment of the NV, **and fully complying with FISMA regulations**.
- ✓ Employ sufficient security measures to protect all data within the NV.
- ✓ Ensure that security policies apply to USAC and any vendors that work on the NV.
- ✓ Use sophisticated analytics of the transactions generated by the NV to actively prevent fraud.
- ✓ Minimize data storage to the extent possible in order to mitigate associated risks.
- ✓ Align our data retention policy to the records schedule mandated by the FCC.
- ✓ Secure all data retained while ensuring cost-effectiveness of data retention.

## **Data storage:** The NV is designed to minimize data storage to the extent possible in order to limit exposure to risk

### **Subscriber / process information:** Keep limited information (including some PII)

#### Information provided by applicants

- Name (First, Last)
- Address
- Date of birth
- Social Security Number (last four digits)
- Eligibility for enhanced tribal subsidy
- Self-reported qualifying program(s)
- Preferred method of communication
- Contact information (e.g., phone, email)
- Type of service (e.g., broadband, mobile)
- Submitted documents (e.g., for manual review)

Fields typically transmitted to query eligibility sources

#### Data generated through National Verifier processes

- Yes / no decision on eligibility from each data source queried (i.e., each program)
- Date of verification
- Application channel (e.g., mail, web portal)
- Name (or unique ID) of individual SP employee performing any transaction

### **Batch files:** Securely delete data after creating local databases

#### In certain scenarios, states and/or central data sources will provide batch files of data rather than connection to a data source

- Batch files will be updated at regular intervals
- To the extent possible, we will arrange to receive batch files that contain no excess information

#### After we build a queryable database, we will securely delete the original batch file

- Deletion procedures will comply with applicable federal and state standards and with any provisions in data use agreements

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## Tech systems / tools: Executive summary

**A critical piece of the Modernization Order is the creation of IT systems and software to centralize Lifeline eligibility determination and simplify the experience for users.**

**In this section, we outline the first steps towards creation of the National Verifier IT solution, including:**

- Approach to outsource the LED build, given strict deadlines and broad capabilities required; and
- Initial vendor management planning to ensure success of the National Verifier build / rollout.

**We developed and released an RFP for a systems integrator to build the NV solution, and expect to complete selection and contract negotiation with the SI by the end of 2016 with the build to begin in early January.**

- In Q1 2017, we will launch an additional RFP for a BPO vendor who will establish processes for manual review, integrated with the full LED solution.

**As we develop the UI / UX of the National Verifier, we will get input (including testing) from stakeholders to ensure that the NV meets user needs.**

- The consumer-facing UI / UX will be designed for desktop, smartphone, and tablet devices, and will be designed to meet stringent accessibility requirements (i.e., 508 compliance).

**In addition, we have identified multiple tools that will help facilitate both the IT systems and overall management of the National Verifier build and roll-out.**

# Per the FCC Modernization Order, IT systems are being created to centralize / streamline eligibility determinations

## Eligibility

### Lifeline Eligibility Database (LED)

- One eligibility engine with many functions:
  - Query qualifying program data sources to determine eligibility;
  - Store yes / no eligibility results; and
  - Queue applications to BPO for manual review when necessary<sup>1</sup>
- Portals for eligibility verification (e.g., consumer web portal, batch uploads)

***New build required***

## Enrollment

### National Lifeline Accountability Database (NLAD)

- Database of all enrolled Lifeline subscribers for calculating payments to SPs;
- Services to check duplicate subscribers / addresses and verify identity; and
- Portal for subscriber updates

***Updates required***

**From a technical standpoint, LED and NLAD will be tightly integrated as part of the single National Verifier solution to ensure a streamlined experience**

1. For example, income verification or when applicant not found automatically in federal / state data sources

# The plan to build the NV covers two major elements: vendor selection and initial vendor management planning

## Vendor selection

**USAC will select a single systems integrator (SI) to work with USAC on the NV build.**

- The SI will provide a single point of accountability for the technical solution.

**Functional requirements were outlined in an RFP, and vendor selection is ongoing.**

- RFP / contract contains incentive structures and contract protections to mitigate risks, especially to ensure on-time delivery.
- Vendor selection is expected by early / mid December; vendor to start work early January.

**Procurement of an additional vendor for BPO needs (e.g., call center, manual review workflows) is planned for early 2017.**

## Initial vendor management planning

**We plan to establish a cross-functional Steering Committee to govern project**

- Members include Lifeline leadership, USAC IT, USAC Procurement, and FCC staff.

**The vendor management plan will include regular check-ins and product demos with the SI vendor to manage project success.**

- Sprint reviews of code every 2-3 weeks;
- Monthly check-ins to understand project status and identify any challenges; and
- Regular reviews / evaluations of product and progress at each milestone.

**FCC Staff have been, and will continue to be, involved at every step of the procurement process**

# USAC has outlined specific tool requirements for implementing the National Verifier

Tool category	Functional need
Process management	<ul style="list-style-type: none"><li>• Comprehensive program management and KPI tracking across all aspects of the National Verifier, for senior leadership visibility and course correction</li><li>• Agile IT development project management and issue tracking / code review</li></ul>
IT infrastructure	<ul style="list-style-type: none"><li>• Cloud platform for scalable transaction and document handling</li></ul>
Core IT software	<ul style="list-style-type: none"><li>• Underlying software application (middleware) to interface data sources and implement workflows</li><li>• Identity authentication, API access, and user account management</li><li>• Ticketing disputes, errors, output to BPO, etc.</li></ul>
Code quality / vendor mgmt	<ul style="list-style-type: none"><li>• Assessment of code quality and system-level architecture for SI vendor management, including for award fee determination</li></ul>
Consumer service	<ul style="list-style-type: none"><li>• Ticketing manual reviews, disputes, consumer interactions / calls, etc.</li><li>• Efficient document intake for review / digital storage</li><li>• Automated call-in options (e.g., for recertification)</li></ul>

**Specific tool recommendations will be determined in collaboration with vendors during NV development**



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## Org structure / staffing: Executive summary

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**In preparation for the launch of the National Verifier, USAC is expanding internal capacity and leveraging support from outside vendors.**

**On an enterprise-wide basis, USAC is adding capacity to support NV.**

**Additionally, we are conducting an RFP process to select quality vendors for the LED system build and for other outsourced operations.**

- Systems integrator to build LED system with project management oversight from Lifeline team; and
- BPO to handle consumer support call center and manual processes.

# The Lifeline org structure needs to transform in order to support changing goals during each phase



## Development and Transition

## Steady state

### Goals

**Build and launch a functional NV with all states enrolled by December 2019**

- Meet deadlines outlined in FCC Modernization Order; and
- Manage transition to new system.

**Sustain a reliable NV for all 56 states and territories**

- Increase long-term efficacy and cost-effectiveness of Lifeline; and
- Gradually introduce next-gen functionality.

### Enablers

- Fast-decision making;
- Flexibility;
- Leveraging external resources; and
- Team collaboration.

- Clear governance and accountability;
- Development of internal expertise; and
- Specialization.

# USAC teams are building capacity to develop, launch, and maintain the National Verifier

	Team	New capabilities stood up through all phases
Lifeline	<b>Solutions delivery and project management</b>	<ul style="list-style-type: none"> <li>• Standing up new team for developing long-term strategy and tracking KPIs as Lifeline adapts to the shifting needs of its subscribers and stakeholders;</li> <li>• Hiring flexible FTEs to provide needed capacity as Lifeline team surges in the development and transition phase; and</li> <li>• Building project plan and refining timeline for tracking milestones across Lifeline teams.</li> </ul>
	<b>Program integrity</b>	<ul style="list-style-type: none"> <li>• Refining review and analytic procedures to detect waste, fraud, and abuse associated with eligibility verification processes</li> </ul>
	<b>Operations</b>	<ul style="list-style-type: none"> <li>• Conducting thorough RFP bidding process to optimize for vendor quality and risk mitigation; and</li> <li>• Standing up strong vendor management structure to manage systems integrator and BPO.</li> </ul>
	<b>Stakeholder engagement</b>	<ul style="list-style-type: none"> <li>• Expanding team to ensure proactive state / federal, SP, and consumer group outreach; and</li> <li>• Increasing capacity to cultivate strong relationships with states and federal agencies.</li> </ul>
USAC enterprise level	<b>Information technology</b>	<ul style="list-style-type: none"> <li>• Including IT members on vendor mgmt. for IT knowledge transfer between SI and Lifeline; and</li> <li>• Providing technical expertise and insight to the vendor management team.</li> </ul>
	<b>Privacy and Security</b>	<ul style="list-style-type: none"> <li>• Enhanced capacity in Privacy and Security teams (e.g., dedicated Chief Privacy Officer and Chief Information Security Officer to ensure compliance with all privacy / security requirements)</li> </ul>
	<b>General counsel</b>	<ul style="list-style-type: none"> <li>• Adding addl. capacity to review data use agreements from state and federal agencies; and</li> <li>• Meeting increased data use agreement compliance needs.</li> </ul>
	<b>Stakeholder engagement</b>	<ul style="list-style-type: none"> <li>• Providing expert user interface and user experience methodologies to support stakeholder engagement with consumers and SPs</li> </ul>

Note: Lists of teams are not exhaustive; additional efforts may be required to support NV from Lifeline or USAC enterprise teams

# Lifeline is also procuring third-party support to ensure smooth NV launch and operations

	Capabilities	Lifeline Vendor Management Plan
<b>Systems Integrator</b>	<p><b>Development of an integrated eligibility engine to:</b></p> <ul style="list-style-type: none"> <li>• Process applications;</li> <li>• Conduct automated eligibility verification; and</li> <li>• Queue applications for manual review when necessary.</li> </ul> <p><b>Development of user-friendly application portals</b></p>	<ul style="list-style-type: none"> <li>• Conduct a thorough RFP bidding process to optimize for vendor quality and risk mitigation (in progress);</li> <li>• Stand up vendor management structure to project manage build;</li> <li>• Stand up governance structure to facilitate decision making;</li> <li>• Proactively track KPIs and project milestones during system build; and</li> <li>• Ensure regular knowledge transfer from vendor to internal Lifeline teams.</li> </ul>
<b>BPO</b>	<p><b>Manual processes and consumer call center to:</b></p> <ul style="list-style-type: none"> <li>• Conduct manual eligibility reviews when automatic checks fail;</li> <li>• Receive and process mail-in applications and IVR recertifications; and</li> <li>• Support communication methods (e.g., mail recert. notices).</li> </ul> <p><b>General consumer support, including for all dispute resolutions</b></p>	<ul style="list-style-type: none"> <li>• Conduct a thorough RFP bidding process to optimize for BPO quality and risk mitigation;</li> <li>• Stand up a vendor management team for surveillance over BPO processes;</li> <li>• Stand up vendor governance structure to facilitate decision making; and</li> <li>• Proactively track KPIs for performance management across BPO processes.</li> </ul>

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## Business case: Executive summary

**The National Verifier aims to increase program integrity and reduce cost and complexity through more automated enrollment, recertification, and reimbursement processing.**

- Strong program integrity: Eligibility verification now conducted by the NV reduces the potential for waste, fraud, and abuse.
- Reduced complexity: More automated and streamlined processes reduce time and effort required.
- Lower cost: SP costs are reduced as they no longer conduct eligibility verification; state costs may also be reduced for eligibility verification based on partnership with the NV.

**We have estimated costs associated with the National Verifier, a significant green-field development, and will continue to refine the assumptions.**

- We have estimated the budget to run NV is approximately \$50M by steady state in 2020.
- We expect that the largest portion of this budget, approximately \$30M, will be spent on direct verification costs annually.
  - This is half of the estimated \$50-70M that Service Providers currently spend on direct verification costs annually.

**The NV costs are also expected to be significantly less than the amount saved from reducing waste, fraud, and abuse.**

## Recall: The National Verifier is designed to deliver on three main goals

1

### Stronger Program Integrity



- Independent eligibility verification, with more automatic checks, conducted directly by USAC to reduce waste, fraud, and abuse
- Single eligibility system to audit and report on potential fraud metrics
- Streamlined, consistent processes to distinguish mistakes from waste, fraud, and abuse

2

### Reduced Complexity



- Streamlined access to eligibility information for Service Providers
- States relieved of maintaining data use agreements and interfaces with multiple SPs
- More automatic checks of data sources to determine eligibility
- Central source of program information and support for consumers

3

### Lower Cost



- SPs relieved of eligibility verification burden
- Lower cost to aggregated system due to more streamlined processes:
  - More automated verification to reduce costly manual reviews; and
  - More automated recertification to reduce costly outreach



## **The NV will be designed to reduce the opportunity for waste, fraud, and abuse in the Lifeline program**

**A lot has been learned from administering the Lifeline program to date, including ramping down from landline to wireless voice service, and through the implementation of duplicate checking procedures.**

**The FCC created the National Verifier in recognition of the challenges in the current model and the opportunities to better address areas of risk in the program.**

**USAC and the FCC are continuing to improve the integrity of the Lifeline program by shifting eligibility verification from Service Providers to USAC.**

**The National Verifier will be the neutral, third-party determiner of applicant eligibility.**

**The NV will make several major changes to strengthen program integrity, including:**

- Service Providers will no longer perform manual document reviews for failed identity checks or failed duplicate address checks.
- Service Providers will no longer perform dispute resolution.
- Service Providers will be reimbursed exclusively based on the list of claimed subscribers in NLAD and not through a separate claim (Form 497).
- The National Verifier will develop consistent forms and processes for subscriber certification.

## The NV will also be designed to reduce process complexity for consumers, states, and Service Providers

Stakeholder	Current Processes	Future Process Improvements due to NV
Consumers	Application and submitting documentation	Consistent experience regardless of Service Provider and fewer documents to submit
	Primarily manual self-certification	Primarily automated recertification
	Various Service Provider and state specific forms	Standardized forms
States	Signing data use agreements with Service Providers	Data use agreement only with USAC
Service Providers	Managing varied eligibility processes and databases across the states	Interact only with the NV
	Application intake	Limited application processing
	Eligibility verification	NV conducts eligibility verification
	Recertification outreach and submission of Form 555	Limited recertification outreach
	Submitting Form 497	Reimbursement directly linked to NLAD

# The National Verifier requires a significant investment to protect program integrity for Lifeline

**The National Verifier is a green field development of significant scale.**

- USAC is standing up an integrated operation that is currently disaggregated across 1200+ SPs.

**USAC will need to develop a sophisticated tech solution for eligibility verification.**

- LED and NLAD will become an integrated system that links eligibility verification, enrollment, and payment processes, which are currently separate systems and processes.
- LED will interface with several federal and state data sources with various eligibility response methods to automate verification as much as possible; interfaces will be built over the next three years and updated on an ongoing basis.
- The NV will be designed to meet best practices for data privacy and security.
- USAC is procuring an expert systems integrator vendor to build, test, and launch this solution.

**USAC will also need a full service vendor to conduct millions of manual reviews where needed and to provide end-to-end consumer support.**

**USAC will be processing approximately 15M applications and conducting recertification for 13M<sup>1</sup> subscribers annually.**

- The NV will be designed to be highly scalable from a capacity perspective, so that it can accommodate increases in the number of applicants, subscribers, and transaction requests.

**This will require standing up an enterprise wide, cross functional team with new capabilities required to manage this large scale operation.**

1. Currently, USAC only conducts annual recertification for 300K subscribers

# There are several components critical to the successful operation of the National Verifier to meet program goals

## Components of a successful National Verifier

Verification	<ul style="list-style-type: none"> <li>• Fast application processing for all new applicants;</li> <li>• Near real-time automated eligibility verification;</li> <li>• If automated verification is not possible, manual reviews; and</li> <li>• Effective annual recertification outreach for the existing 13M subscribers</li> </ul>	<b>Functions disaggregated across 1,200+ SPs</b>
Consumer support	<ul style="list-style-type: none"> <li>• Responsive, full-service consumer support call center and web channels</li> </ul>	
Tech systems / tools	<ul style="list-style-type: none"> <li>• New integrated LED / NLAD system interfacing with federal / state data sources;                             <ul style="list-style-type: none"> <li>– Enables identity, duplicate, and automated eligibility verification</li> </ul> </li> <li>• Streamlined interfaces / application channels for consumers and SPs;</li> <li>• Accurate reimbursement processing based on NLAD; and</li> <li>• Flexible reporting functionality for all stakeholders</li> </ul>	
Human capital	<ul style="list-style-type: none"> <li>• Additional USAC-wide resources required to support NV; and</li> <li>• Expert vendors hired to augment internal resources</li> </ul>	

**The NV will provide complete eligibility verification services, assuming costs currently incurred by 1,200+ SPs**

# Total budget to run NV ~\$40-55M by steady state in 2020

Build costs expected to be ~\$35-40M (spent over 3 years)

*Preliminary: Model based on best assumptions available at this time: to be refined as data become available*

**National Verifier build grand total (\$)**  
(costs incurred over ~3 years)

~\$35-\$40M

## Budget Estimate for the National Verifier<sup>1</sup> – Steady state in 2020

### Assumptions for steady state:

- All 56 states / territories have launched NV;
- All available federal / state data sources are integrated; and
  - Large majority of eligibility verifications are automated
- Approximately 15M applicants and 13M subscribers (similar to today).

#### Verification:

- Application processing;
- Eligibility verification (automated / manual); and
- Recertification outreach.

~ \$25-30M

See comparison to current costs incurred by SPs on next slide

#### Consumer support

~ \$10-15M

#### Tech systems / tools:

- LED / NLAD ops & maint. (including IT FTEs); and
- Hardware / software license costs.

~ \$4-6M

#### Human capital:

- Lifeline FTEs;
- USAC FTEs; and
- Outside FTEs.

~ \$3-5M

Costs will grow from now until 2020 as more states launch NV

**Operations grand total (\$)**

~\$40-\$55M

1. Budget based on current volumes; cost estimates based on interviews with Service Providers and state administrators

# Deep dive: NV direct verification costs are expected to be half of direct verification costs currently incurred by SPs

## Efficiencies gained by the National Verifier

### Increased automated verification for enrollment

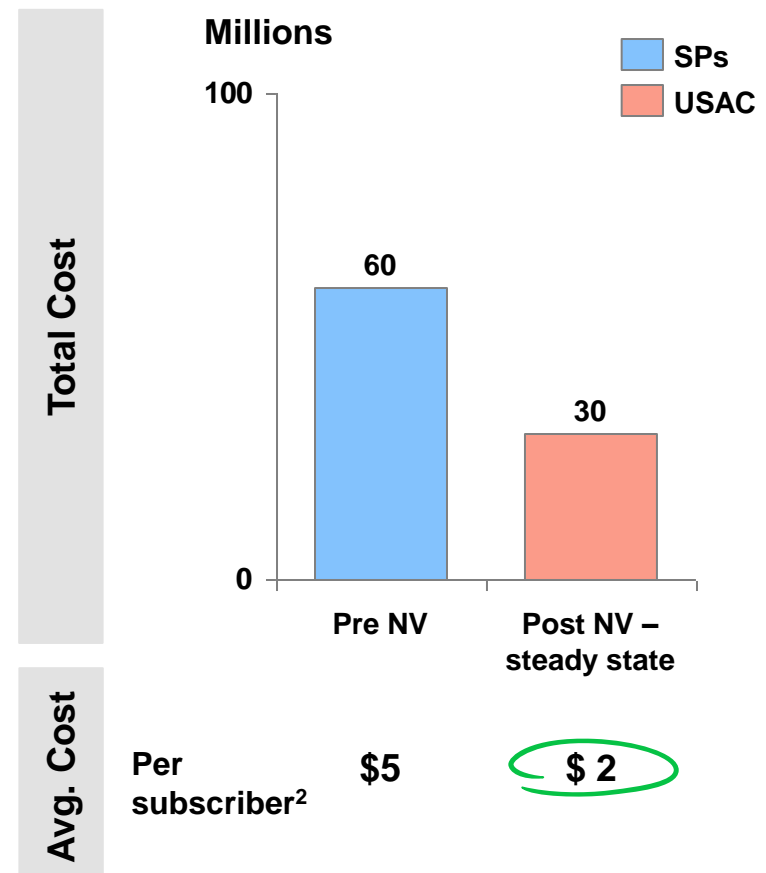
- Automated API link to federal and state data sources where possible; and
- Costly manual verification only if applicant is not found in a data source.

### Automated verification and notification for recertification

- Costly outreach (e.g., mail and reminder calls / texts) only if subscriber is not found in a data source.

### Larger volumes enable efficiencies of scale and drive down costs.

## Estimated direct verification cost savings<sup>1</sup>



1. Only includes enrollment and recertification costs for automated and manual verification; does not include consumer support, tech systems, or human capital costs.

2. Assumes current 13M subscribers both pre-NV and post-NV.

Note: In some states, third parties administer eligibility verification and incur costs

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## KPIs / Metrics: Executive summary

**Establishing the right KPIs / metrics is critical to monitoring the success of this effort.**

**KPIs must measure the success of the National Verifier based on goals outlined in the Modernization Order:**

- Reducing waste, fraud, and abuse;
- Reducing cost and complexity; and
- Improving consumer experience.

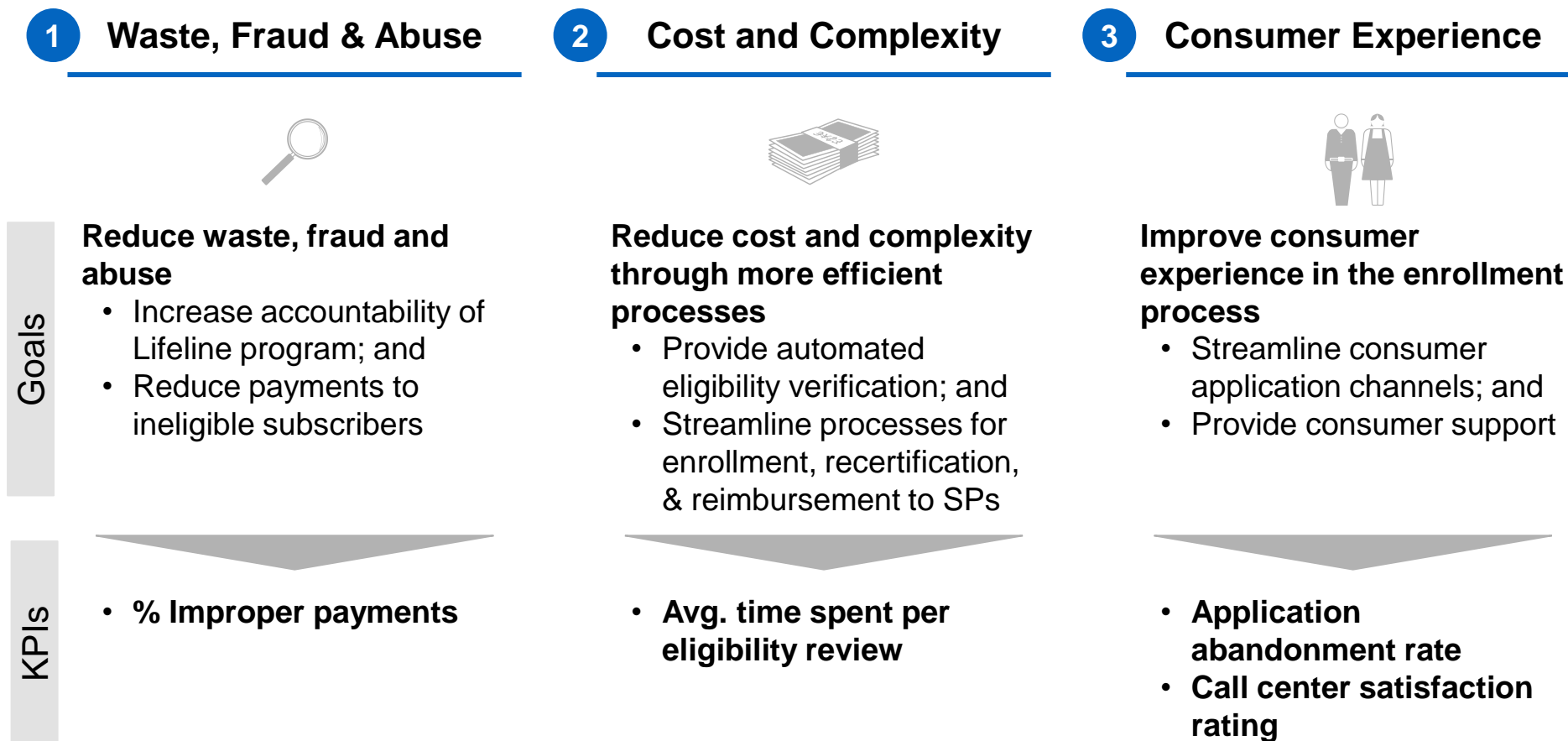
**Thus far, we have identified four primary key performance indicators (KPIs) to be tracked by the Lifeline team on a regular basis:**

- Primary KPIs will be reviewed by USAC leadership and facilitate data-driven executive decision making.
- These KPIs complement broader Lifeline metrics that are tracked on a regular basis.
- The KPIs we track will evolve over time as we continue the rollout of the National Verifier.

**We will also monitor additional general program metrics (e.g., transaction volume, recertification percentage) to identify anomalies and outliers.**



# Four KPIs identified to date to measure the success of the National Verifier based on goals in the Modernization Order



**Leadership to review KPIs on a regular basis – will use dashboards to facilitate ongoing tracking**

## **We will also use data analytics to track for anomalies and outliers across a number of general program metrics**

### **Trends monitored for waste, fraud, and abuse:**

- Enrollment activity (e.g., access patterns / query volumes across different user types)
- Recertification rates across segments (e.g., self-recertification rates, % automated vs. manual recertification)
- Audit findings analysis (e.g., number and type of common findings from audits)

### **Metrics monitored for consumer experience:**

- Verification success rates (compared across different user types)
- Call center metrics (e.g., call volumes, complaint type)

**We will continue evaluating opportunities to conduct new analytics to strengthen program integrity**

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## Risk management: Executive summary

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**Strong risk management is vital to the success of the National Verifier.**

**To date, we have identified six initial challenges that could impact the successful launch, build, and operation of the National Verifier.**

- We have identified relevant risks that could affect both the development / transition and steady state phases.
- Risk register will be continually updated as NV is operationalized.

**We identified mitigation strategies to proactively address each risk.**

- As we operationalize the National Verifier in 2017, we will assign an owner to each risk in order to ensure that mitigation strategies are updated and carried out effectively.

## Six key risks identified for the National Verifier

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- ① **Operations capacity management**
- ② **Systems integrator delivery**
- ③ **Emergency preparedness**
- ④ **Data breach preparedness**
- ⑤ **Availability of automated eligibility verification**
- ⑥ **Data source connections**

## Risks and mitigation strategies (1/2)

	Risk	Description	High-level mitigation strategy	Dev / Trans <sup>1</sup>	Steady State <sup>2</sup>
1	Operations capacity management	<ul style="list-style-type: none"> <li>There is inadequate operational capacity to effectively manage new processes and high volumes of eligibility verifications.</li> </ul>	<ul style="list-style-type: none"> <li>Leverage experience / capacity of broader USAC staff (e.g., applying lessons learned from prior experiences, flex capacity as required).</li> <li>Use flexible BPO staffing model to scale capacity for manual reviews as necessary.</li> </ul>	✓	✓
2	Systems integrator delivery	<ul style="list-style-type: none"> <li>The systems integrator does not build LED solution that adequately meets standards.</li> </ul>	<ul style="list-style-type: none"> <li>Design SI contract terms to incentivize performance and hold vendor accountable to deadlines.</li> <li>Conduct a thorough RFP / procurement process to optimize for vendor quality.</li> <li>Stand up strong vendor management structure to manage project build.</li> </ul>	✓	
3	Emergency Preparedness	<ul style="list-style-type: none"> <li>A natural or man-made disaster occurs and hinders USAC or vendor operations.</li> </ul>	<ul style="list-style-type: none"> <li>Contract with an outside vendor with relevant subject matter expertise to develop thorough disaster preparedness and recovery plan.</li> <li>Develop and document periodic testing strategy and maintain proactive communication with vendors to ensure compliance .</li> </ul>	✓	✓

## Risks and mitigation strategies (2/2)

4	Risk	Description	High-level mitigation strategy	Dev / Trans <sup>1</sup>	Steady State <sup>2</sup>
	Data breach preparedness	<ul style="list-style-type: none"> <li>A data breach occurs that exposes consumer data.</li> </ul>	<ul style="list-style-type: none"> <li>Design all NV systems in compliance with federal data security and privacy laws and obligations under data use agreements.</li> <li>Frequently review, test, and update data breach and security measures and communicate plan with appropriate stakeholders.</li> <li>Chief Information Security Officer and Chief Privacy Officer will incorporate best practices for privacy and security.</li> </ul>	✓	✓
5	Availability of automated eligibility verification	<ul style="list-style-type: none"> <li>Data sources that can be used for automated eligibility are not available to USAC.</li> </ul>	<ul style="list-style-type: none"> <li>Design efficient manual review processes to use when automated sources not available .</li> </ul>	✓	✓
6	Data source connections	<ul style="list-style-type: none"> <li>Established state or federal data source connections fail.</li> </ul>	<ul style="list-style-type: none"> <li>Explore backup sources for automated eligibility verification.</li> <li>Use flexible BPO staffing model to scale capacity for manual reviews as necessary.</li> </ul>	✓	✓

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## Transition management: Executive summary

**This section outlines the main actions required to successfully build and launch the National Verifier in all 56 states and territories by the end of 2019.**

- Actions are divided into five core modules critical to successful development and transition.

**We first established a robust governance structure.**

- Senior FCC Staff and USAC Executive Committee oversee the five main modules.
- Each module will be owned by senior officials at USAC.

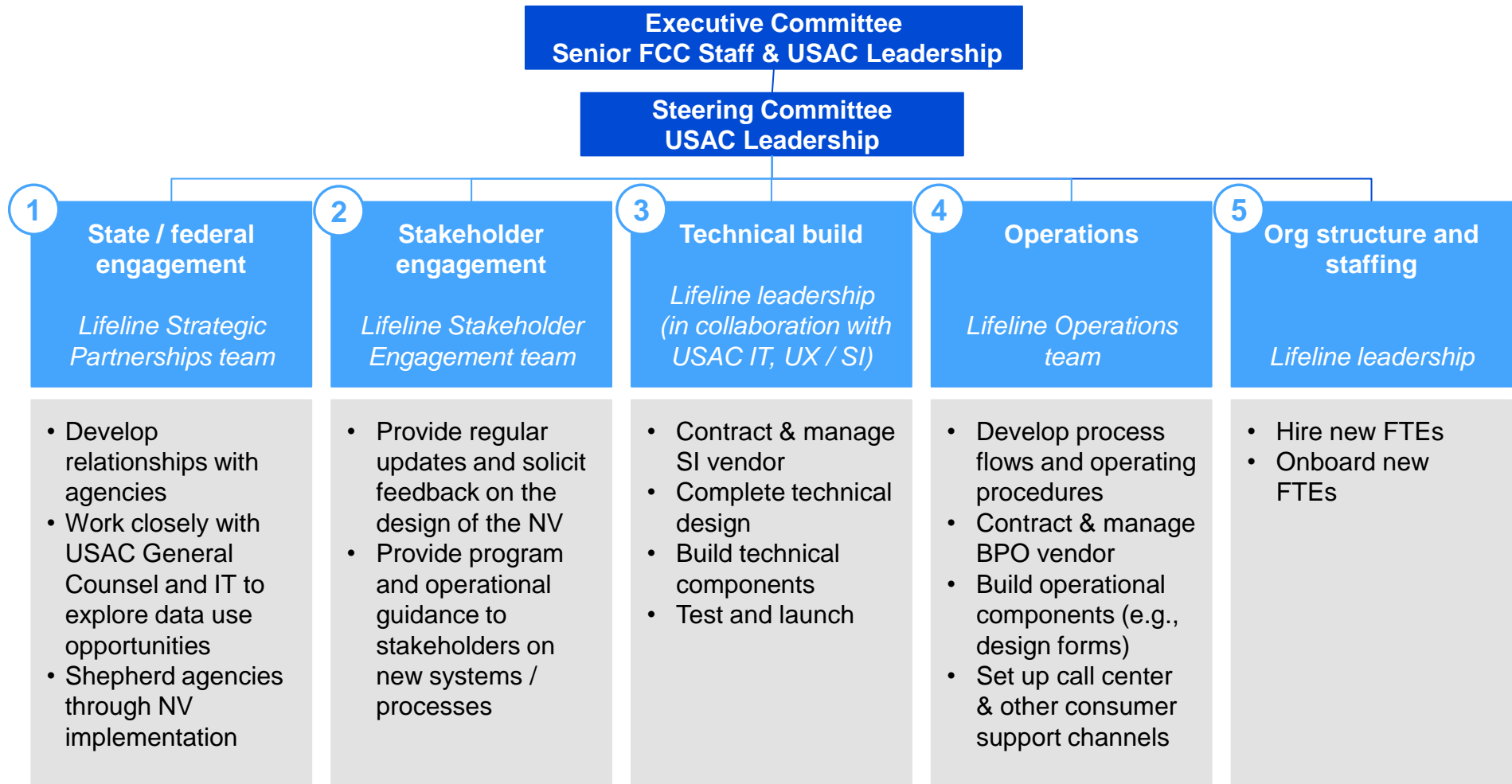
**This governance structure will be supported by detailed project management roadmaps, dashboards, and toolkits for each module.**

- These project management tools will help track progress and flag and resolve issues.

**USAC is following an iterative, consultative process to build a pipeline of states to launch the National Verifier.**

- We will have multiple waves each year so states can launch NV when they are ready.

## Recall: USAC has a robust governance structure to successfully build and launch NV



**USAC is developing a project management plan for each of these 5 modules**

# USAC will use three main project management tools to track NV progress and to flag and resolve issues

1

## Roadmaps

**Provides detailed timeline for each module**

- Major milestones
- Main activities

**Tracks deadlines for NV launch**

- Soft and hard launch for each wave

2

## Dashboards

**Provides summary of progress against milestones**

- Detailed view for each module
  - Action item, owner, deadline, and status
- Aggregated view across modules to provide summary to Steering and Executive Committees
  - Highlights key risks and mitigation strategies

3

## Toolkits

**Provides a to-do list of main action items each stakeholder needs to complete to launch NV**

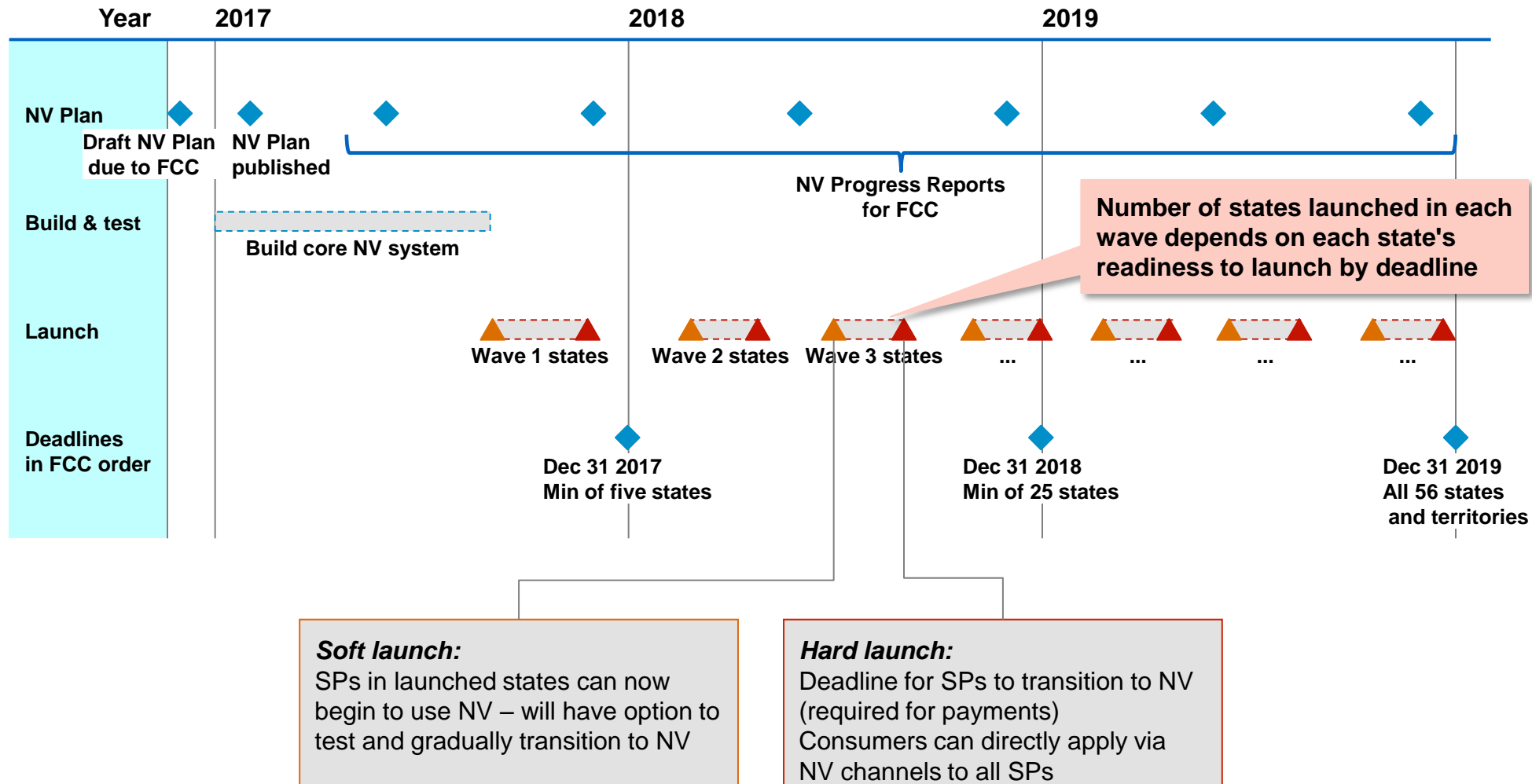
- Only applies to modules affecting:
  - States
  - Federal agencies
  - Service Providers

*More information on next slides*

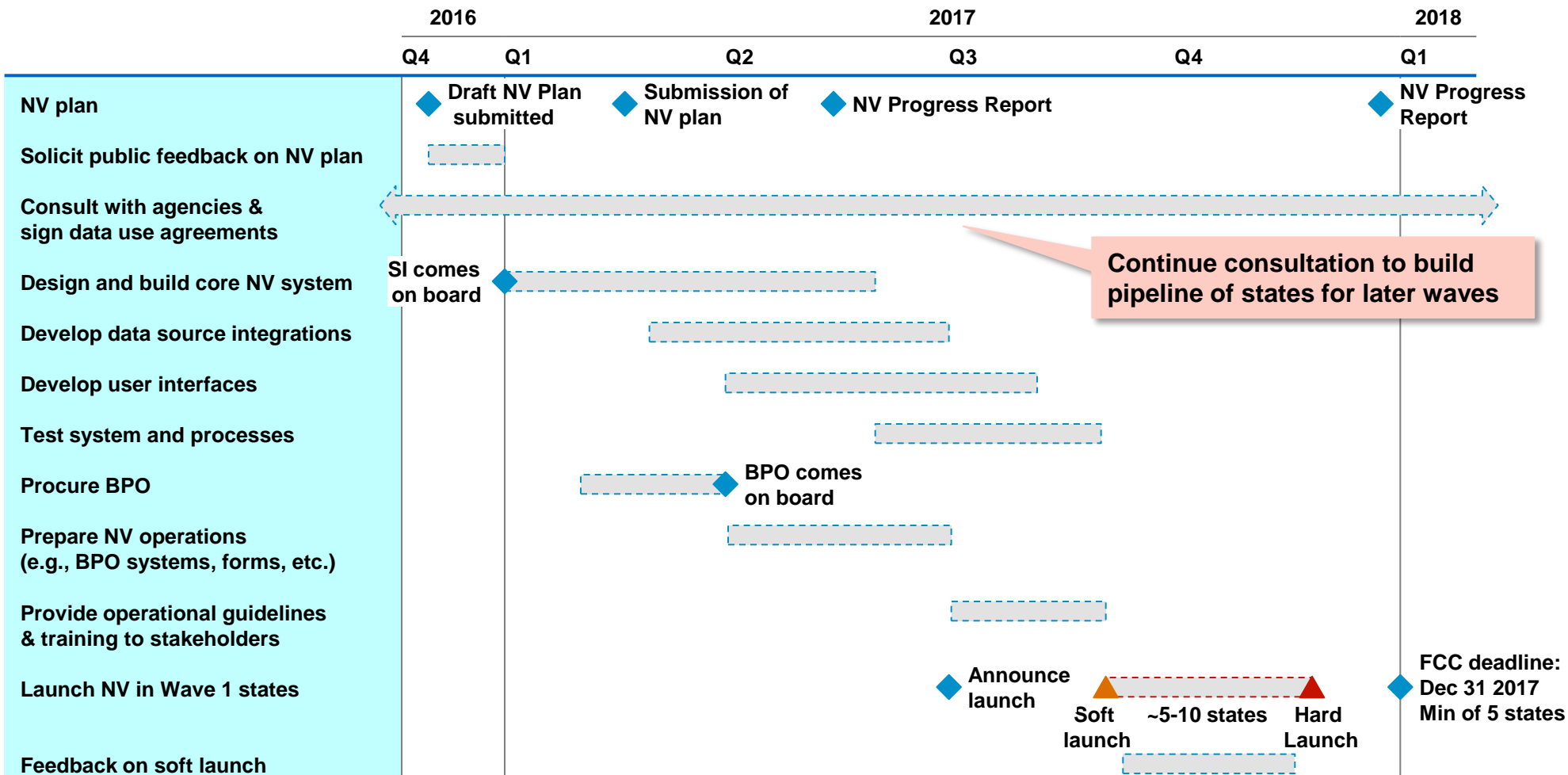
# Program roadmap: Propose multi-wave launch approach

States launch NV when ready with window for SPs to transition

Launches will be announced by FCC Public Notice well in advance



# Deep dive on 2017 roadmap: Initial focus on building the core NV system for the first wave



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## USAC response to Draft NV Plan public comments (1/16)

	Comment received	USAC response
Consumer interaction	Upon a successful benefit transfer, is the subscriber's eligibility extended for another year?	The subscriber's eligibility is not automatically extended. However, a subscriber can recertify immediately after a successful benefit transfer if he/she consents and desires to do so.
	Who communicates with the current subscriber in case of a TPIV or AMS failure in use case #11, the PII update process (e.g. name change, updated address)?	<p>In the event of a TPIV or AMS failure during the PII update process, the SP is responsible for communicating this to the subscriber.</p> <p>However, if the duplicate address / household checks fail as a result of the update, the subscriber may need to submit additional documentation to the NV (e.g., an IEH form, identity documentation).</p>
	What languages will USAC use in consumer communications?	<p>USAC is committed to ensuring accessibility for all consumers, regardless of language proficiency. English and Spanish will be provided; USAC is now determining which additional languages to provide.</p> <p>USAC also welcomes SP efforts to support customers in additional languages.</p>

## USAC response to Draft NV Plan public comments (2/16)

	Comment received	USAC response
Consumer interaction (cont.)	Can USAC elaborate more on the identity / role of aggregators? Can they advocate on behalf of consumers?	Policies and procedures for aggregation projects are currently being developed with the FCC. USAC will communicate details as they become available through the NV website, webinars, emails, and bulletins, as applicable. USAC will also provide future opportunities for feedback.
	How will USAC educate consumers on the NV's associated process changes?	USAC will conduct outreach through multiple channels. USAC is considering a variety of options, including (but not limited to) the following: creating educational materials, offering a consumer-oriented call center, working with consumer groups, and updating our consumer-facing website regularly.
	Will documents always be submitted directly by the applicant to the NV?	<p>The NV will work with the consumer to make all eligibility determinations.</p> <p>USAC recognizes that consumers may choose to enroll in Lifeline with the help of SPs. Indeed, the NV business architecture specifically contemplates SPs assisting consumers in a variety of use cases.</p> <p>USAC expects SPs to continue assisting consumers in compliance with the Lifeline rules.</p>



## USAC response to Draft NV Plan public comments (3/16)

	Comment received	USAC response
Consumer interaction (cont.)	SPs need to be able to follow up with consumers if bad documentation is provided to the NV by an applicant (e.g., if a document is rejected in manual review).	<p>If SPs are assisting with the application of a consumer (with applicant consent), they will be notified of issues with that submission.</p> <p>USAC and the incoming systems integrator are working to determine the specific technical details of how the SP notification process will function.</p>
	The consumer login / authentication process should be intuitive (e.g., no application number required). Additionally, what is the login recovery process?	<p>USAC is working with an experienced incoming systems integrator to design the NV, including the consumer authentication function, and will design the login process to be as consumer-friendly as possible while adhering to high security standards.</p> <p>USAC intends to allow consumers to recover their login information online with PII, or through consumer interaction with the NV call center.</p> <p>USAC is committed to a superior consumer experience and will continue to seek feedback from interested stakeholders on best practices for consumer authentication.</p>

## USAC response to Draft NV Plan public comments (4/16)

	Comment received	USAC response
Consumer interaction (cont.)	Is there any scenario where a subscriber successfully completes a benefit transfer in NLAD, but fails an eligibility check?	The NV will not recheck eligibility when processing a benefit transfer. Therefore, there is no scenario where a subscriber successfully completes a benefit transfer in NLAD, but would fail an eligibility check at that time.
	Can USAC describe whether it is possible for a consumer to correct a submitted self-certification form during the recertification process?	Subscribers will be able to correct a submitted self-certification form during the recertification process, as long as they do so within the 60-day window to return the self-certification form.
	Can SPs act as agents of applicants (e.g., for remote signups), including functions like document upload and application status check?	In compliance with the Lifeline program rules, SPs can assist applicants to upload documents and check eligibility / status with the consent of the applicant.
	Consumer information functionality should be more robust (e.g., specific information about Lifeline SPs available by ZIP Code).	USAC will provide ZIP-level information on Lifeline SPs to consumers. USAC will continue to seek feedback from interested stakeholders on how best to present this information and keep it updated.
	De-enrollment communication should include ability to directly cancel service (as well as information on how to stay connected without the subsidy).	USAC is unable to provide the ability to directly cancel service, since the contract is with the SP. However, USAC intends to provide the subscriber with relevant consumer information in the event of de-enrollment.

## USAC response to Draft NV Plan public comments (5/16)

	Comment received	USAC response
<b>Consumer interaction (cont.)</b>	Who verifies consumer's consent in a benefit transfer? The SP or the NV?	<p>The SP should obtain a subscriber's consent before initiating a benefit transfer request.</p> <p>Additionally, USAC will notify a subscriber each time a benefit transfer is completed. This will allow subscribers to raise concerns if a benefit transfer has been completed without the subscriber's consent.</p>
<b>NV / third party interaction</b>	Can USAC clarify the designation and approval processes for "other approved third parties"?	USAC continues to seek feedback on how to make these processes as easy as possible for all stakeholders, and will provide further guidance closer to the launch of the NV.
<b>NV / state interaction</b>	<p>Will state-specific forms still exist, or will there be a single national form?</p> <p>Additionally, what will the role of state verifiers be once the NV is implemented?</p>	<p>USAC plans to use a single, national set of forms for the federal Lifeline benefit. However, applicants must fill out any required state-specific Lifeline forms in order to claim state Lifeline funds.</p> <p>The federal Lifeline program is distinct from any state-specific low-income telecommunications support programs. All federal Lifeline applications will be handled by the NV, leveraging existing state processes as appropriate.</p>

## USAC response to Draft NV Plan public comments (6/16)

	Comment received	USAC response
NV / state interaction (cont.)	What is the role of NLAD-opt-out state subscriber databases under the NV?	NLAD opt-out states are allowed to remain as such for duplicate checking purposes. However, all eligibility checks will be conducted by the NV, even in NLAD opt-out states.
		USAC will continue to seek feedback from all stakeholders on how best to work with NLAD opt-out states in designing processes that affect these states.
NV / SP interaction	Can USAC further clarify audit and documentation-related procedures?	Audit responsibilities and procedures will be detailed as part of the SP guidelines communicated in the coming months.
	De-enroll notifications should be pushed to SP through the NV API.	De-enrollment information will be available through the NV's reporting functionality. USAC will continue to seek feedback from SPs on the best methods to share NV transaction information.
	How will USAC communicate system updates or fixes to the NV in advance?	All system updates and fixes will be communicated in advance through the NV website, webinars, emails, and bulletins. USAC will work with the incoming systems integrator to create features allowing targeted messaging to the relevant audience upon scheduled or unscheduled fixes.

## USAC response to Draft NV Plan public comments (7/16)

	Comment received	USAC response
NV / SP interaction (cont.)	Can SPs see whether a customer is up for recertification at the time of benefit transfer, and can SPs collect a recertification form on behalf of the subscriber if within the window?	<p>SPs will be able to see their own subscribers' recertification status in the NV's reporting functionality, and consumers will always be able to access their own recertification status. Upon a successful benefit transfer, SPs will be able to view the recertification status of their new subscribers.</p> <p>USAC is unlikely to allow entities other than the NV to collect and retain recertification forms from consumers. However, USAC welcomes all efforts by SPs, in compliance with the Lifeline program rules, to aid consumers in the recertification process.</p>
	Will USAC share data with SPs regarding how (e.g., by what method) a consumer proved eligibility for Lifeline?	USAC currently provides these data on an aggregate level, available on our website. USAC does not intend to share this information for individual consumers due to consumer privacy concerns.
	Will the SP receive interim updates on the status of subscribers currently up for recertification, and can SPs check on an ad hoc basis (e.g., API call for status)?	SPs will be able to view this information through the NV's reporting functionality. SPs will be able to query status for individuals, as well as for their entire subscriber base. USAC will continue to seek feedback on how SPs would like to receive this information.

## USAC response to Draft NV Plan public comments (8/16)

	Comment received	USAC response
NV / SP interaction (cont.)	How often will SPs receive updates on the NV development and implementation process?	<p>USAC will continue to communicate actively with all stakeholders during the NV development process. USAC will continue to hold Lifeline webinars and publish weekly updates on the NV website.</p> <p>USAC will hold additional feedback sessions throughout implementation of the NV. As appropriate, and in conjunction with the incoming systems integrator, USAC will also offer SPs workshops and training programs around the NV's system processes.</p> <p>As always, USAC accepts stakeholder questions at <a href="mailto:LifelineProgram@usac.org">LifelineProgram@usac.org</a></p>
	Will more feedback sessions and working groups be held, and will USAC provide further documentation and guidance (e.g., toolkits/process guidelines, timelines, implementation details and updates) to SPs?	<p>USAC, the incoming systems integrator, and the incoming BPO, will develop a plan to engage stakeholders for feedback and updates on implementation. Detailed SP guidelines will be created for the SP community, with forms, procedures, and expectations for common use cases. These will be communicated through the NV website, webinars, emails, bulletins, and SP workshops. Please email <a href="mailto:LifelineProgram@usac.org">LifelineProgram@usac.org</a> if you would like to be included in the related communications.</p>

## USAC response to Draft NV Plan public comments (9/16)

	Comment received	USAC response
NV / SP interaction (cont.)	Can USAC enumerate all co-branding opportunities?	USAC recognizes that SPs have a unique relationship with consumers, and that co-branding in certain instances will be beneficial for the consumer experience. USAC will provide a list of co-branding opportunities in the future, and will hold targeted workshops / feedback sessions with SPs to determine what those opportunities will be.
	Is there a review or escalation process should a SP disagree with its snapshot report? Will upward payment revisions ever be permitted for subscribers not on the snapshot report (e.g., if there are technical difficulties)?	Downward revisions are part of the standard payment review process. However, USAC will not permit upward payment revisions for subscribers not on the NLAD snapshot report.  In case of unique circumstances, USAC, in compliance with the Lifeline program rules, will work with SPs on a case-by-case basis to resolve any outstanding issues.

## USAC response to Draft NV Plan public comments (10/16)

	Comment received	USAC response
NV / SP interaction (cont.)	Will SPs have to retain documents submitted to the NV for verification purposes?	<p>For new enrollments in NV states once the NV is operational (i.e., those processed by the NV), SPs are no longer responsible for maintaining documents to prove Lifeline eligibility.</p> <p>USAC will provide further information regarding document retention requirements.</p>
	Will current Lifeline subscriber documents held by the ETC be migrated into the NV?	<p>In line with the current Lifeline program rules, SPs will be required to retain eligibility documentation provided by current subscribers. This rule also applies to future subscribers who enroll prior to the launch of the NV in any given state.</p> <p>Although SPs will not migrate eligibility documents for these subscribers to the NV, USAC notes that it reserves the right to request documents from SPs as it deems necessary.</p>
Technical questions	Can USAC define the SLAs for dispute resolution, manual review, and batch application?	SLAs will be clarified during the NV build with the incoming systems integrator and BPO provider, and will be as close to real time as possible given constraints.



## USAC response to Draft NV Plan public comments (11/16)

	Comment received	USAC response
Technical questions (cont.)	Can USAC further define the "system status" dashboard?	<p>USAC will work with the incoming systems integrator to ensure that the system status dashboard provides key status information to interested stakeholders.</p> <p>USAC will continue to seek feedback from interested stakeholders as to specific items that would be valuable to include.</p>
	Will SPs have a ticketing system to track issues they raise? Can USAC also publish system issues for SPs to see?	<p>In conjunction with the incoming NV systems integrator, USAC is currently determining the best way to track issues raised by SPs (or other users of the NV system). This will likely be a ticketing system, but USAC will issue further guidance at a later phase in the NV development process.</p> <p>USAC will work closely with the incoming systems integrator to identify the best way to publicly publish system issues (e.g., on the system status dashboard) to meet the needs of all interested stakeholders.</p> <p>USAC will continue to seek specific feedback on the best ways to ensure that both of these important goals are fully accomplished.</p>

## USAC response to Draft NV Plan public comments (12/16)

	Comment received	USAC response
Technical questions (cont.)	If there is an NV outage and the NV (or parts of it) is not operational, does that mean that all enrollments will be stopped?	The NV will be built with contingencies for points of failure, including ability to continue eligibility checks / enrollments with manual review when possible.
	Will there be a separate call center / hotline to address system issues?	USAC recognizes the need to provide superior multi-channel customer service to all stakeholders, and is committed to ensuring that the NV is fully supported. In line with that commitment, USAC will provide a hotline to address system issues.
		USAC will continue to seek feedback from interested stakeholders on the best way to address system issues.
	How will the NV rollout take cross-state SACs into account? Is rolling out in geographically proximate states possible?	For NV rollout purposes, all SACs will be associated with a single state. When the state associated with the SAC enters the NV, SPs will be required to follow NV processes for all consumers associated with that SAC, regardless of the consumer's state of residence.  Absent compelling reasons to the contrary, each SAC will be considered to be part of the state in which the majority of its subscribers resides.

## USAC response to Draft NV Plan public comments (13/16)

	Comment received	USAC response
Technical questions (cont.)	The NV payment system must be able to accommodate flexible reimbursement amounts for tribal land (as well as for voice drawdown or payments affected by consent orders).	The NV will be built to accommodate flexible reimbursement amounts (e.g., a variable tribal subsidy per subscriber). SPs will be required to enter reimbursement amounts for each individual subscriber for whom the SP is not claiming the default reimbursement amount.
	What is the expected minimum timeframe that will be set for the NV soft launch? Further, approximately when will NV API documentation / a test environment be available?	USAC will continue to seek feedback from all stakeholders around appropriate soft launch timelines. Currently, USAC anticipates that the soft launch will begin in approximately late Q3 2017 (please refer to slides 95-96 in this document).
		USAC and the incoming systems integrator will release details on the timing of system testing and API document availability through the NV website, webinars, emails, bulletins, and workshops.
		USAC will provide further information in advance of the NV soft launch.

## USAC response to Draft NV Plan public comments (14/16)

	Comment received	USAC response
Technical questions (cont.)	How will USAC handle data sources that are known to update periodically (i.e., that may not always contain realtime correct information)?	<p>USAC understands that there is technical variance across the 56 states and territories, as well as among federal agencies. USAC is committed to working with each of our data source partners to ensure the success of the NV by utilizing real-time eligibility information to the extent possible.</p> <p>USAC also notes that in the case of a failed automated eligibility check result, manual review will still be permitted in compliance with the Lifeline rules.</p>
	Will automated recertification checks occur periodically while awaiting receipt of subscriber self-certification forms to account for data sources that only update periodically?	<p>The frequency of automated recertification checks will be clarified during the NV development process.</p> <p>USAC also notes that in the case of a failed automated recertification result, self-certification will still be permitted in compliance with the Lifeline rules.</p>
	How will the NV handle challenges with address verification, specifically in Puerto Rico?	USAC is aware of potential challenges with address verification in Puerto Rico. USAC will continue to seek feedback from stakeholders on specific best practices that may inform how to best resolve this challenge, to the degree that address verification challenges affect any state or territory.

## USAC response to Draft NV Plan public comments (15/16)

	Comment received	USAC response
Technical questions (cont.)	Will the NLAD verify API call still be available when the NV is operational?	Yes, the NLAD "Verify" API call will still be available.
	Can USAC provide more detail on any plans to test the NV with real data prior to launch (and how SPs can sign up to test), as well as on plans for robust disaster recovery and system redundancy for outages?	<p>USAC will employ a robust testing protocol. USAC will offer SPs opportunities to test with either test or real data prior to launch. Additionally, USAC will offer a soft launch period (see slides 95-96) in order for SPs to test with real customer data.</p> <p>USAC plans to seek further feedback on how best to coordinate with SPs to conduct testing during the development and deployment of the NV system.</p> <p>USAC will work with the incoming systems integrator to incorporate best practices relating to disaster recovery and system redundancy plans for the NV.</p>
	SPs should be involved in recertification in Tribal areas, since letters will not be timely received; more broadly, SPs may need to serve as proxies for subscribers in these rural / Tribal areas.	<p>USAC recognizes the impact that SP-to-subscriber outreach can have on the recertification process, particularly in Tribal areas.</p> <p>USAC therefore welcomes SP involvement in the recertification process to the extent permissible under the Lifeline program rules.</p>

## USAC response to Draft NV Plan public comments (16/16)

### Comment received

The NV's methodology for Tribal verification should be modified to make it more consumer-friendly. For example, all self-certifications should occur at the point of enrollment.

### Tribal matters (cont.)

### USAC response

USAC is committed to ensuring that the Lifeline program is successful across all Tribal nations. USAC has spent considerable time learning directly from Tribal consumers and Tribal leaders about the unique challenges facing Tribal communities.

Additionally, USAC continues to gain insights into the eligibility verification and documentation processes used by other Tribally-focused federal programs, such as Tribally-administered TANF / Head Start and USDA RUS. USAC also continues to learn from best practices shared by Tribally-focused Lifeline SPs.

Under the NV, residency on Tribal lands will continue to be verified through self-certification; USAC anticipates that the vast majority of self-certifiers will do so at the point of enrollment. USAC believes that the proposed Tribal lands residence verification methodology is consumer-friendly.

USAC continues to welcome feedback from Tribal communities on the best ways to serve consumers on Tribal lands; in fact, USAC is currently in the process of creating a Tribal nations outreach component to work directly with consumers on Tribal lands going forward. USAC believes that the NV will help USAC and the Lifeline program continue to achieve the important goal of meeting the unique needs of Tribal communities.

## **Appendix: Glossary of terms**

# Glossary (1/4)

Term	Definition	Explanation
Aggregation project	Aggregation project	A group of eligible households, which individually opt into the group, that negotiates as a single entity with SPs for Lifeline service; the group is often administered by a community-based organization (e.g., a housing association) <b>known as an "aggregator."</b>
AMS	Address Management System	A service provided by the U.S. Post Office that allows subscribers to verify the existence of an address, and to standardize it into proper format.
API	Application Programming Interface	A code that allows two software programs to interact with one another. The API defines the correct methods by which a developer can write a program that requests services from another application.
BPO	Business Process Outsourcing	The process of contracting non-primary business activities to a third-party vendor (e.g., consumer support / service, manual review support).
Data use agreement	Data use agreement	A formal agreement between two parties to establish protocols and standards that govern the handling (including storage) of any data transferred between the parties.
<b>Dispute resolution</b>	<b>Dispute resolution process</b>	<b>A process by which USAC, through the National Verifier, will review an adverse decision upon the request of the applicant.</b>
FCC	Federal Communications Commission	An independent agency of the United States Federal Government charged with regulating interstate and international communications by radio, television, wire, satellite and cable in all US states and territories.
Form 497	Form filled out by Lifeline SPs to claim Lifeline subsidies	Form for Service Providers that have provided eligible consumers with Lifeline Program-supported service to receive reimbursement for providing service at discounted rates.



# Glossary (2/4)

Term	Definition	Explanation
FTE	Full-time equivalent	A unit that indicates an amount of workload that requires the capacity of a single full time employee.
IEH	Independent Economic Household	A unit that may only receive one Lifeline benefit (commonly known as the one-per-household rule); also refers to a form that certain consumers must submit in order to certify that no more than one Lifeline benefit is received per household.
IVR	Interactive Voice Response	Technology that allows humans to interact with a computer over the phone, through use of speech recognition and/or the telephone keypad.
KPI	Key Performance Indicator	A business metric used to evaluate performance with respect to factors crucial to the success of the National Verifier.
LED	Lifeline Eligibility Database	System to check whether a consumer is eligible for Lifeline based on income or enrollment in qualifying assistance programs.
NARUC	National Association of Regulatory Utility Commissioners	National association representing state public service (utility) commissioners.
NASUCA	National Association of State Utility Consumer Advocates	Nonprofit organization with members from 40 states and DC, representing consumer / ratepayer interests on issues related to public utilities.
NLAD	National Lifeline Accountability Database	Existent system to allow SPs to check on a real time, nationwide basis whether a consumer is already receiving a Lifeline Program-supported service, and to maintain records of Lifeline subscribers.
NV	National Verifier	A system to conduct eligibility determinations and other functions necessary to enroll eligible subscribers into Lifeline.

# Glossary (3/4)

Term	Definition	Explanation
PII	Personally identifiable information	Information that can be used, either by itself or in conjunction with other information, to identify, contact, or locate an individual person.
RFP	Request for Proposal	A document issued by an organization that desires to procure services or commodities; the document typically outlines the services or commodities desired and initiates the formal procurement process.
SI	Systems integrator	A company that specializes in integrating multiple component subsystems or parts into a single system.
SLA	Service-level agreement	An official commitment between a vendor and a customer that defines the standard to which the service will be performed (e.g., maximum time to complete a process, minimum percentage uptime).
SORN	System of Records Notice	A notice in the Federal Register serving as public notification that a U.S. federal government system collecting PII was created or revised.
SP	Service Provider	A telecommunications company that provides service (i.e., wireline voice, wireless voice, wireline broadband, wireless broadband) to consumers.
States	States, territories, and tribal lands	50 U.S. states + DC, Puerto Rico, Guam, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, and tribal lands.
Third party	Third party	An party outside of the National Verifier that is not a Service Provider, consumer, social services program / agency, state / federal agency, USAC, or verifier partner, but that has an interest and/or role to play in the National Verifier's processes.

# Glossary (4/4)

Term	Definition	Explanation
TPIV	Third party identity verification	A service that verifies the existence of a person who corresponds to the PII submitted by an applicant by using public and private records (e.g., birth certificates, real estate ownership, credit history).
UI/UX	User Interface / User Experience	The components of a system that humans interact with, as well as the actual experience of an end user's interaction with the system.
USAC	The Universal Service Administrative Company	A non-profit corporation designated by the Federal Communications Commission (FCC) as the permanent administrator of the Universal Service Fund (USF), which includes the Lifeline program.
USF	Universal Service Fund	A fund, established by the Telecommunications Act of 1996, whose goal is to ensure that every American has access to vital telecommunications services; the Lifeline program is a component of the USF.
Verifier partner	A data source used to check for Lifeline eligibility	An agency or organization (often, but not exclusively, governmental) that partners with the National Verifier to provide a data source that the National Verifier can check in order to determine whether an applicant is eligible for the Lifeline subsidy.